EPA REGISTRATION NUMBER 53053-24 - INFORMATION ADDE FILE FROM JANUARY 2017 TO APRIL 2019	D TO



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

April 18, 2019

Cinda Bell Agent for Indusco, Ltd. 2319 Joe Brown Drive Greensboro, NC 27405

Subject:

Label Amendment – Marketing claim changes and other minor modifications

Product Name: EnviroSystems BioShield 75

EPA Registration Number: 53053-24 Application Date: October 10, 2018

Decision Number: 545140

Dear Ms. Bell:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

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with FIFRA section 6. If you have any questions, please contact Tara Flint via email at flint.tara@epa.gov or Eric Miederhoff at Miederhoff.eric@epa.gov.

Sincerely,

Eric Miederhoff

Product Manager 31

Regulatory Management Branch I Antimicrobials Division (7510P) Office of Pesticide Programs

Enclosure

ACCEPTED

04/18/2019

53053-24

ENVIROSYSTEMS® BIOSHIELD® 75 MICROBIOSTATIC AGENT*

For use as an antimicrobial preservative under EPA and FDA Regulations to preserve food contact articles. (Food Preparation Surfaces, Polymeric Tubing for Beverages, Activated Carbon Water Filters) subject to FDA Regulations.**

KEEP OUT OF REACH OF CHILDREN

CAUTION

[See [side] [back] panels for additional precautionary statements]

Active Ingredient:3-(trihydroxysilyl)propyldimethyloctadecyl ammonium chloride:	0.75%
Other Ingredients:	99.25%
Total Ingredients:	100.00%

EPA Reg. No. 53053-24 EPA Est. No. XXXX-XX-XXX

Net Contents: 32 fluid oz., 1, 5, 30, 55, 275 gal.

Lot No.:

IndusCo, Ltd. 2319 Joe Brown Drive Greensboro, NC 27405 (336) 375-7555 www.induscoltd.com

Notes:

[Bracketed Text] is optional text.

(Bracketed Text) is for administrative purposes only and will not appear on the marketplace label.

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^{*} A microbiostatic agent is an agent that inhibits the growth of odor causing bacteria and fungi (mold and mildew), bacteria and fungi (mold and mildew) which cause staining and discoloration, and algae. This product does not protect users or others against food-borne or disease-causing bacteria or fungi.

FIRST AID

Have the product container or label with you when calling the poison control center or doctor, or going for treatment.

IF ON SKIN:

- · Take off contaminated clothing.
- · Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.
- Call a poison control center or doctor for further treatment advice.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, and then continue rinsing.
- Call a poison control center or doctor for treatment advice.

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able toswallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION. Causes moderate eye irritation. Avoid contact with skin, eyes and clothing. Harmful if inhaled or absorbed through the skin. Avoid breathing vapors or spray mist. Wear protective eyewear and protective clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using the toilet. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

Commercial and Industrial uses: This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

<u>Residential use</u>: This pesticide is toxic to fish. Do not contaminate water by cleaning of equipment or disposal of pesticide. Do not apply directly to water.

De-activation required during clean up if a spill occurs. De-activation of [EnviroSystems® BioShield® 75] [this product] can be achieved by the addition of anionic surfactant (such as soap, sulfonates, sulfates) in quantity equivalent to that of [EnviroSystems® BioShield® 75] [this product].

Notes:

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STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

Pesticide Storage: Store in original, tightly closed containers below 30°C (86°F) and above 0°C (32°F) in a secure area inaccessible to children and away from food or feed.

Pesticide Disposal:

{Residential use} Wastes resulting from the use of this product may be disposed on site. {Commercial/industrial use} Wastes resulting from the use of this product may be disposed on site or at an approved waste disposal facility.

Container Handling:

(Residential use) Securely wrap original container in several layers of newspaper and discard in trash.

{Commercial/industrial use} Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying.

{Insert applicable triple rinse instructions for container size below}

(5 gal or less)

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

{More than 5 gal}

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

Then offer for recycling if available, or puncture and dispose in a sanitary landfill, or by other procedures approved by state and local authorities.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Wear protective eyewear (goggles or face shield), gloves, and protective clothing when using this product. Dry treated areas and articles such as clothing before use. Remove children and pets from treated area until completely dry. Clean surfaces prior to application.

EnviroSystems® BioShield® 75 is a READY TO USE product only.

EnviroSystems® BioShield® 75 [This product] can be applied to organic or inorganic substrates by brushing, dipping, padding, soaking, spraying, or by using foam finishing techniques.

The substrate can be dried at temperatures from ambient to a maximum of 160°C (320°F) to effect complete condensation of siland groups and to remove water, solvents and/or traces of methanol from hydrolysis. Optimum application and drying conditions, such as time and temperature, should be determined for each application before use. If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.

EnviroSystems® BioShield® 75 when used as a concrete additive is added directly during concrete preparation. Use 40 fluid ounces per cubic feet of concrete. Addition of EnviroSystems® BioShield® 75 reduces deterioration of sewer pipes and manholes by inhibiting microbiologically induced corrosion

Commercial and Industrial Locations

Use EnviroSystems® BioShield® 75 [this product] in/on the locations listed below.

Homes

Bathrooms

Shower and bath areas

Restaurants

Convenience stores

Institutions

Clinics Colleges

Dental Offices

Health Care Facilities

Universities

Churches Schools

Hospitals

Medical Offices Nursing Homes

Barber shops

Salons

Camp grounds

Day Care Centers

Nurseries Playground areas

Farms

Animal laboratories Animal Clinics

Hog Farms Kennels

Pet Animal quarters Pet shops

Mushroom Farms Poultry Farms

Turkey Farms

Athletic Facilities

Dairy Farms

Exercise facilities Locker Rooms

Prisons

Notes:

Zoos

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Correctional Facilities

Airplanes

Ambulances Boats

Public rest rooms Public Facility

Buses Campers

Businesses and office buildings

Campers

Dressing rooms

Emergency vehicles

Transportation terminals

Mobile Homes Ships Taxis Trailers Factories Hotels Motels Airports

The active ingredient in EnviroSystems® BioShield® 75 is effective against odor causing bacteria and fungi (mold and mildew), bacteria and fungi (mold and mildew) which cause staining and discoloration, and algae as a static agent. EnviroSystems® BioShield® 75 can be used as a final bacteriostatic finish on the following items to impart bacteriostatic/fungistatic (mold and mildew) and algaestatic activity.

- Air filters for furnaces, air-conditioners, air purification devices, automobiles, recirculating air handling systems
- Air filters/materials
- Aquarium filter material
- · Bed sheets, blankets, and bedspreads
- Buffer pads (abrasive and polishing)
- Carpets and draperies
- Concrete additive for sewer pipes, manholes and concrete sewer structures; not to be used in treatment of storm drains
- Concrete additive for repair and renewal of sewer pipes and manholes and concrete sewer structures (Not to be used in treatment of storm drains)
- Fiberfill for upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, polyester, rayon, or wool
- Fire hose fabric
- HVAC, air filters and ductwork (Flexable ductwork; bendable durable plastic and rigid ductwork; sheet metal, fiberglass ductboard, and fiberboard)
 Humidifier belts
- · Mattress pads and ticking
- Men's underwear and outerwear
- Non-woven polyester
- Outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos)
- Polyurethane and cellulose foam for household, industrial, and institutional mops
- Polyurethane and polyethylene foam, when covered
- Polyurethane foam for packaging and cushioning
- Polyurethane foam used as a growth medium
- Roofing materials defined as shingles, roofing granules, wood shakes, felt, stone and synthetic overcoats
- Sand bags, tents, tarpaulins, sails and ropes
- Athletic and casual shoes

Notes:

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- Shoe insoles
- · Shower curtains
- Socks comprised of nylon, nylon/orlon, cotton/nylon, linen/Lycra, acrylic/polypropylene/nylon/Lycra, wool/silk/nylon/Lycra and wool/acrylic/nylon/Lycra
- Throw rugs
- Toweling made of 100 percent cotton, 100 percent polyester, and blends of the two fibers
- Toilet tank and seat covers
- Umbrellas
- Upholstery made of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, and wool
- Vacuum cleaner bags and filters
- · Vinyl paper-wallpaper
- Disposable wiping cloths that can be used for multiple purposes such as dusting or washing furniture, cars, walls, windows, floors, exterior surfaces of appliances; the wiping cloths do not impart pesticide properties
- Women's hosiery
- Women's intimate apparel

For Pump Spray Application: EnviroSystems® BioShield® 75 is a READY TO USE product only. Using pump sprayer, spray entire area 4" – 6" from the surface making sure the surface is completely covered. Apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test for staining and color-fastness of fabrics and carpets by treating and drying a small, concealed area prior to application. One gallon of EnviroSystems® BioShield® 75 treats approximately 200 square feet. When treating coarser substrates, more EnviroSystems® BioShield® 75 may be required due to absorption. A fan may be used to assist in drying carpeting.

For Commercial Spray Application: EnviroSystems® BioShield® 75 is a READY TO USE product only. For commercial application equipment (i.e. carpet/upholstery steamers, rotary jet extraction cleaners, electrostatic sprayers, pressure sprayers) apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test for staining and color-fastness of fabrics and carpets by treating and drying a small, concealed area prior to application. One gallon of EnviroSystems® BioShield® 75 treats approximately 200 square feet. When treating coarser substrates, more EnviroSystems® BioShield® 75 may be required due to absorption. Dry carpet areas and surfaces before reentry and dry articles before use. A fan may be used to assist in drying carpeting.

For Dipping/Soaking Application: EnviroSystems® BioShield® 75 is a READY TO USE product only. Use appropriate sized wash basin or tub for dipping/soaking the item to be treated. One gallon of EnviroSystems® BioShield® 75 treats approximately 200 square feet of items of hard surface or approximately 8 pounds of fabric. The item must be fully submerged in EnviroSystems® BioShield® 75 for at least 3 minutes. Remove item and dry. Test for staining and color-fastness of fabrics by treating and drying a small, concealed area prior to application. Do not reuse solution after dipping/soaking.

The substrate can be dried at room temperatures or at temperatures to a maximum of 160°C (320°F), for example in a clothes dryer. Remove excess liquid before attempting to dry in a clothes dryer. If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.

Notes:

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**FOR USE AS AN ANTIMICROBIAL TO PRESERVE FINISHED FOOD CONTACT ARTICLES SUBJECT TO FDA REGULATIONS.

Incorporate EnviroSystems® BioShield® 75 Microbiostatic Agent as an antimicrobial additive to coat the polymeric manufactured products listed below that are used for manufacturing, processing, packing, packaging, transporting, handling and/or holding food or water if such use is not intended to have any effect in the food or water itself. Do not incorporate BioShield® 75 Microbiostatic into any food or water contact application listed on this label unless the substance is approved, with associated use conditions, for food or water contact in 21 CFR 174-186 (inclusive) as amended or in the US FDA's Food Contact Substance Notification System, as amended.

Food Preparation Surfaces

This Food Contact Substance (FCS) can be used as an additive without food or beverage type or temperature limitation, in food or beverage preparation and processing surfaces (where FCS is applied to the surface as a coating).

Use:

Food contact coatings, films and laminates.

Products:

- Appliances, equipment and utensils, (used in preparing and processing of food products for human and animal consumption)
- Barrier fabrics
- Building materials and components, (used in food preparation and processing areas)
- Collection and storage equipment (such as conveyor systems, piping systems, silos, tanks, and process vessels made from any material)
- · Cookware made from any material

Notes:

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- Countertops and cutting boards made from composite materials, stainless steel,
- Food wrap (including coated deli paper, coated food interleaves, plastic wrap, polystyrene and plastic trays, aluminum foil)
- General purpose containers of any material for short and long term storage
- Glazing for cement tiles
- Glazing for vitreous china used in plumbing fixtures such as countertops, sinks and other vessels
 - Industrial equipment and machinery for the preparation, processing or transportation of food and beverage products
- Natural and synthetic fibers and fabrics in any combination of compositions packaging (made from paper, plastics or metals)
- · Paper products (such as wipes, tissues, wall coverings, towels)
- Plastic film (of any weight and composition)
- Sinks and other vessels used for cleaning or transporting food and beverage products

Maximum Concentration:

1% active weight percent of resin, laminate, or coating.

One gallon of EnviroSystems® BioShield® 75 treats approximately 200 square feet of item.

Polymeric Tubing for Beverages

Polymeric tubing for transfer of beverages and drinking water.

Use:

Food contact molded plastic and metal parts.

Products:

- Beverage dispensing equipment tubing
- Beverage processing equipment tubing
- Holding tanks
- Pump

Maximum Concentration:

1% active weight percent of finished tubing.

One gallon of EnviroSystems® BioShield® 75 treats approximately 200 square feet of the item.

Activated Carbon Water Filters

Repeat use activated carbon water filters and other water filter media.

Use

Process and drinking water filter

Products:

 Activated carbon water filters (and synthetic woven or non-woven media, zeolite and other natural media)

Notes:

[Bracketed Text] is optional text.

{Bracketed Text} is for administrative purposes only and will not appear on the marketplace label. Maximum Concentration:

0.25% active weight percent of the carbon block.

Application:

EnviroSystems® BioShield® 75 is a READY TO USE product only. [EnviroSystems® BioShield® 75] [This product] can be applied to organic or inorganic substrates by brushing, dipping, padding, soaking, spraying or by using foam finishing techniques.

The substrate can be dried at temperatures from ambient to a maximum of 160°C (320°F) to effect complete condensation of silanol groups and to remove water, solvents and/or traces of methanol from hydrolysis. Optimum application and drying conditions, such as time and temperature, should be determined for each application before use. If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.

Notes:

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Residential Applications

The active ingredient in EnviroSystems® BioShield® 75 is effective against odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae as a static agent. EnviroSystems® BioShield® 75 is a READY TO USE product only. EnviroSystems® BioShield® 75 can be used as a final bacteriostatic finish on the following items to impart bacteriostatic/fungistatic (mold and mildew) and algaestatic activity.

	Pest controlled	Method of Application
Bedsheets, blankets, bedspreads, curtains, draperies (washable only), underwear, socks, intimate apparel, hosiery, throw rugs, toweling, toilet tank covers, shower curtains, shoe insoles, outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos). EnviroSystems® BioShield® 75 can be applied to fabrics made of acetates, acrylics, cotton, fiberglass, linen, Lycra, nylon, orlon, polyester, polyethylene, rayon, silk, spandex, vinyl, and wool.	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	DIP/SOAK: Use appropriate sized wash basin or tub for dipping/soaking the item you are treating. One gallon of EnviroSystems® BioShield® 75 treats approximately 200 square feet of items of hard surface or approximately 8 pounds of fabric. The item must be fully submerged in EnviroSystems® BioShield® 75 for at least 3 minutes. Remove item and wring excess liquid. Drying may be attained by dripping dry or wringing excess liquid from treated item. For larger items (e.g., bedspreads, curtains, draperies), Place in washing machine on spin cycle to aid in the removal of excess liquid. Test staining and color-fastness of fabric and carpets by treating and drying a small concealed area prior to application. Do not reuse solution after dipping/soaking. Dry treated articles before use. Substrates can be hang-dried at room temperature or at temperatures to a maximum of 160°C (320°F), (for example in a clothes dryer). Remove excess liquid before attempting to dry in a clothes dryer. If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return. SPRAY: Clean surface prior to application. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"-6" from the surface making sure the surface is completely covered. One gallon of EnviroSystems® BioShield® 75 treats approximately 200 square feet. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. Test staining and color-fastness of fabric by treating and drying a small, concealed area prior to application. If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains and mildew stains return.

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	Pest controlled	Method of Application
Air filters and air filter material for Furnaces, air conditioners Air purification systems Automobiles Recirculating air handling systems Vacuum cleaner filters Aquariums	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew), and algae.	SPRAY: When treating filters, remove filter from the unit. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4" – 6" from the surface making sure the surface is completely covered. One gallon of EnviroSystems® BioShield® 75 treats approximately 200 square feet. Apply and then let stand until dry. If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains and algae stains return.
	Pest controlled	Method of Application
Carpeting	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	SPRAY: Apply to clean carpet surface. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4" – 6" from the surface making sure the surface is completely covered. For rotary jet extraction cleaners and carpet steamers, add EnviroSystems® BioShield® 75 directly to the cleaning tank, then operate the equipment in accordance with manufacturer's instructions. Apply and then let stand until dry. Test staining and color-fastness of carpets by treating and drying a small, concealed area prior to application. EnviroSystems® BioShield® 75 treats approximately 200 square feet per gallon (50 square feet per quart). When treating coarser substrates (e.g. wool carpeting), more EnviroSystems® BioShield® 75 may be required due to absorption. Dry carpet areas and surfaces before re-entry. A fan may be used to assist in drying carpeting. Remove children and pets from treated areas until completely dried. If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains and mildew stains return.

Notes:

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	Pest controlled	Method of Application
Mattress pad and mattress ticking and upholstery composed of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, wool; fiberfill to be used in upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, rayon or wool.	Odor causing bacteria, bacteria which cause staining And discoloration, and fungi (mold and mildew)	SPRAY: Clean surfaces prior to application. Using a trigger pump sprayer, spray the entire surface area 4" – 6" from the surface making sure the surface is completely covered. One gallon of EnviroSystems® BioShield® 75 treats approximately 200 square feet. Apply and then let stand until dry or let stand 3 minutes and wipe dry with a cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test staining and color-fastness of fabric by treating and drying a small, concealed area prior to application. When applying to mattress pads and ticking do not soak. Remove children and pets from treated area until completely dried. If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains and mildew stains
	Pest	return. Method of Application
	controlled	
Tents, tarpaulins, sails, ropes	Odor causing bacteria, bacteria which cause staining And discoloration, fungi (mold and mildew) and algae.	SPRAY: Clean surface prior to application. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4" – 6" from the surface making sure the surface is completely covered. One gallon of EnviroSystems® BioShield® 75 treats approximately 200 square feet. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test staining and color-fastness of fabric by treating and drying a small, concealed area prior to application.
		If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains and algae stains return.
		DIP/SOAK: Use appropriate sized wash basin or tub for dipping/soaking the item you are treating. One gallon of EnviroSystems® BioShield® 75 treats approximately 200 square feet of items of hard surface or approximately 8 pounds of fabric. The item must be fully submerged in EnviroSystems® BioShield® 75 for at least 3 minutes. Remove item and wring excess liquid, Do not reuse solution after dipping/soaking. Dry treated articles before use. Substrates can be hang-dried at room temperature or at temperatures to a maximum of 160°C (320°F); (for example in a clothes dryer). Remove excess liquid before attempting to dry in a clothes dryer.

		If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.
	Pest controlled	Method of Application
Roofing materials (such as shingles, roofing granules, wood shakes, felt, stone, synthetic overcoats)	Odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae.	SPRAY: Make sure the roof is clean prior to application. Using a pressure sprayer, spray the entire surface area 6"-12" from the surface making sure the surface is completely covered. After applying EnviroSystems® BioShield® 75 let stand until dry. EnviroSystems® BioShield® 75 treats approximately 200 square feet of roofing per gallon (50 square feet per quart). If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.
	Pest controlled	Method of Application
Buffer pads (polishing and abrasive), Polyurethane and cellulose foam for household mops, vacuum cleaner bags, umbrellas, casual shoes, athletic shoes	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	SPRAY: Clean surface prior to application. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4" – 6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. EnviroSystems® BioShield® 75 treats approximately 200 square feet. If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains and mildew stains return.
	Pest controlled	Method of Application
Tubs, glazed tiles, vanity tops, shower curtains, shower stalls (areas), sinks, washable walls, wall paper, floors, window sills, cabinets, garbage cans, appliances, refrigerators (exterior), fiberglass, formica, glazed tiles, glazed porcelain, synthetic marble, plastic, vinyl.	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	SPRAY: Using a trigger pump sprayer, spray the entire surface area 4" – 6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. EnviroSystems® BioShield® 75 treats approximately 200 square feet. If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.

Notes:
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Optional Marketing Statements / Claims

Imparts microbiostatic properties.

Use on carpet and upholstery to inhibit odor causing bacteria and fungi (mold and mildew), bacteria and fungi (mold and mildew) which cause staining and discoloration.

Unscented.

Use on carpet and upholstery to inhibit the growth of odor causing bacteria.

Use on carpet and upholstery to inhibit the growth of bacteria which cause staining and discoloration.

Use on carpet and upholstery to inhibit the growth of fungi (mold and mildew) which cause staining and discoloration.

Use on carpet and upholstery to inhibit the growth of odor causing bacteria and fungi (mold and mildew), bacteria and fungi (mold and mildew) which cause staining and discoloration.

Provides an invisible microbiostatic coating to inhibit the growth of odor causing bacteria.

Provides an invisible microbiostatic coating to inhibit the growth of bacteria which cause staining and discoloration.

Provides an invisible microbiostatic coating to inhibit the growth of fungi (mold and mildew) which cause staining and discoloration.

Provides an invisible microbiostatic coating to inhibit the growth of algae.

Provides an invisible microbiostatic coating to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae.

Prevents deterioration caused by bacteria and fungi (mold and mildew) which cause staining and discoloration.

Inhibits deterioration caused by bacteria.

Resists development of microbial odors.

Resists development of stains and discoloration due to bacteria.

Resists development of stains due to fungi (mold and mildew) which cause staining and discoloration.

Resists stains due to algae.

Resists development of microbial odors, stains and discoloration due to bacteria and fungi (mold and mildew), bacteria and fungi (mold and mildew) which cause staining and discoloration and algae

Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria.

Provides/creates an invisible barrier to inhibit the growth of bacteria which cause staining and discoloration.

Provides/creates an invisible barrier to inhibit the growth of fungi (mold and mildew) which cause staining and discoloration.

Provides/creates an invisible barrier to inhibit the growth of algae.

Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria and fungi (mold and mildew), bacteria and fungi (mold and mildew) which cause staining and discoloration and algae.

Inhibits the growth of odor causing bacteria between cleanings.

Inhibits the growth of bacteria which cause staining and discoloration between cleanings. Inhibits the growth of fungi (mold and mildew) which cause staining and discoloration between cleanings.

Inhibits the growth of algae between cleanings.

Inhibits the growth of odor causing bacteria and fungi (mold and mildew), bacteria and fungi (mold and mildew) which cause staining and discoloration and algae between cleanings.

Mold, mildew, odor protector and inhibitor.

EnviroSystems® BioShield® 75 is an antimicrobial agent effective against odor causing bacteria. EnviroSystems® BioShield® 75 is an antimicrobial agent effective against bacteria which cause staining and discoloration.

Notes:

[Bracketed Text] is optional text.

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Page 13 of 16 4/17/19 EnviroSystems® BioShield® 75 is an antimicrobial agent effective against fungi (mold and mildew) which cause staining and discoloration.

EnviroSystems® BioShield® 75 is an antimicrobial agent that inhibits mildew.

EnviroSystems® BioShield® 75, an antimicrobial agent, controls the source of odors on surfaces in the home, in the bathroom, in the kitchen.

Bacteriostatic, fungistatic (mold and mildew), algaestatic.

EnviroSystems® BioShield® 75, an antimicrobial agent, inhibits smelly odors caused by mold and mildew that can grow even in the cleanest of homes.

EnviroSystems® BioShield® 75, an antimicrobial agent, inhibits the growth of odor causing bacteria.

Effective on hard non-porous washable bathroom and kitchen surfaces and fixtures around the home.

Effective on modern hard non-porous washable surfaces made of fiberglass, glazed porcelain, Formica®, stainless steel, synthetic marble.

Durable antimicrobial.

Approved for use on food contact surfaces.

Mold Free for up to 3 months.

3 Months

Protection for indoor and outdoor use

Creates an invisible barrier to inhibit the growth of mold to keep indoor and outdoor surfaces mold free for up to 3 months.

Reapply this product every 3 months to replenish barrier from mold and mildew.

Waterproof

Odor free.

24-hour protection.

FOR MORE INFORMATION CONCERNING THIS PRODUCT, PLEASE CONSULT THE SAFETY DATA SHEET (SDS). THE SDS CAN BE OBTAINED BY CONTACTING:

IndusCo, Ltd. 2319 Joe Brown Drive Greensboro, NC 27405 (336) 375-7555 www.induscolld.com

IMPORTANT: WARRANTY AND DISCLAIMER INFORMATION

IndusCo, Ltd warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated in this bulletin when used in accordance with directions under normal conditions of use; but this warranty of fitness for a particular purpose does not extend to the use of this product contrary to bulletin instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to the seller, and buyer assumes the risk of any such use.

INDUSCO, LTD SPECIFICALLY DISCLAIMS ANY OTHER EXPRESS OR IMPLIED WARRANTY, INCLUDING THE WARRANTY OF MERCHANTABILITY.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

October 12, 2018

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

CINDA L. BELL SCIREG, INC. AGENT FOR INDUSCO LTD 12733 DIRECTOR'S LOOP WOODBRIDGE, VA 22192-

PRODUCT NAME: ENVIROSYSTEMS BIOSHIELD 75

COMPANY NAME: INDUSCO LTD OPP IDENTIFICATION NUMBER: EPA FILE SYMBOL: 53053-24 EPA RECEIPT DATE: 10/10/18

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Antimicrobials Division, Risk Management Team 31, at 703-347-8028.

Sincerely,

Front End Processing Staff Information Services Branch

Information Technology & Resources Management Division



October 10, 2018

Mr. Eric Miederhoff
Document Processing Desk (AMEND)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Re: EnviroSystems BioShield 75 (EPA Reg. No. 53053-24)

- Label amendment

Dear Mr. Miederhoff:

On behalf of IndusCo, Ltd. (EPA Co. No. 53053), SciReg, Inc. is submitting a label amendment for EnviroSystems BioShield 75 (EPA Reg. No. 53053-24). The following additions to the label are being made.

- Locations where product can be used.
- Use on HVAC materials.
- Fogging application.
- Marketing claims.

If you have any questions, please contact me at 703-494-6500 or cbell@SciReg.com.

Sincerely.

Cinda L. Bell, MS

Regulatory Specialist

Circle & BICH

Enclosures

SEPA	United States Environmental Protecti Washington, DC 204	X Amenda Other		Identifier Number	
	Applicati	on for Pesticide - S	ection I		
1. Company/Product Number 53053-24		2. EPA Product N Eric Miederh	Manager	3. Proposed (Classification
 Company/Product (Name) EnviroSystems BioShie 	d 75	PM# 31			
5. Name and Address of App IndusCo, Ltd 2319 Joe Brown Drive Greensboro, NC 27405 Check if this is					
		Section - II			
Resubmission in responsible Notification - Explain be Explanation: Use additional Label amendment to update	page(s) if necessary. (For section I	"Me Too" Other - E	Application. xplain below.		
Married This Day of AMEL	D. D. J.	Section - III			
1. Material This Product Will Child-Resistant Packaging Yes No * Certification must the submitted	Be Packaged In: Unit Packaging Yes No If "Yes" Unit Packaging wot Container	A COMPANY OF THE PROPERTY OF T	Per	Container Metal Plastic Glass Papel Other (Specify)	
3. Location of Net Contents In	formation 4 Size(s) Reta	il Container	5. Location of Label D On label On label accor	irections	
5. Manner in Which Label is A		glued	ſ		
		Section - IV			
Contact Point (Complete it	ems directly below for identification of	f individual to be contacted, if r	necessary, to process th	is application.)	
lame Cinda L. Bell		Title Agent for IndusCo, Ltd.	NA CONTRACTOR OF THE CONTRACTO	elephone No. (Inclu 03-494-6500; cb	
	Certific vhich I have made on this form and e vingly false or misleading statement or	ell attachments thereto are true		e. Re	ate Application eceived (Stamped)

3. Title

5. Date

10/10/18

Agent for IndusCo, Ltd.

Conda & Bell

2. Signature

4. Typed Name

Cinda L. Bell



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

February 1, 2018

Olivia Laird Agent/Consultant IndusCo, Ltd. 2319 Joe Brown Drive Greensboro, NC 27405

Subject:

Label Amendment - Add food use claims to label

Product Name: ENVIROSYSTEMS BIOSHIELD 75

EPA Registration Number: 53053-24 Application Date: August 8, 2017

Decision Number: 532637

Dear Ms. Laird:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new laheling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

Page 2 of 2 EPA Reg. No. 53053-24 Decision No. 532637

with FIFRA section 6. If you have any questions, you may contact Joe Daniels at (703) 347-8669 or via email at daniels.joseph@epa.gov.

Sincerely,

Eric Miederhoff
Product Manager 31

Regulatory Management Branch I Antimicrobials Division (7510P) Office of Pesticide Programs

Enclosure

ACCEPTED

02/01/2018

Under the Federal Insecticide Fungicide and Rodenkoide Act as amended for the pesticide registered under EPA Reg No.

53053-24

ENVIROSYSTEMS® BIOSHIELD® 75 MICROBIOSTATIC AGENT*

For use as an antimicrobial preservative under EPA and FDA Regulations to preserve food contact articles. (Food Preparation Surfaces, Polymeric Tubing for Beverages, Activated Carbon Water Filters) subject to FDA Regulations.**

KEEP OUT OF REACH OF CHILDREN

CAUTION

[See [side] [back] panels for additional precautionary statements]

Active Ingredient:3-(trihydroxysilyl)propyldimethyloctadecyl ammonium chloride:	0.75%
Other Ingredients	99.25%
	.100.00%

EPA Reg. No. 53053-24 EPA Est. No. XXXX-XX-XXX

Net Contents: 32 fluid oz., 1, 5, 30, 55, 275 gal.

Lot No.:

IndusCo, Ltd. 2319 Joe Brown Drive Greensboro, NC 27405 (336) 375-7555 www.induscoltd.com

Notes:

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^{*} A microbiostatic agent is an agent that inhibits the growth of odor causing bacteria and fungi (mold and mildew), bacteria and fungi (mold and mildew) which cause staining and discoloration, and algae. This product does not protect users or others against food-borne or disease-causing bacteria or fungi,

FIRST AID

Have the product container or label with you when calling the poison control center or doctor, or going for treatment.

IF ON SKIN:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.
- Call a poison control center or doctor for further treatment advice.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, and then continue rinsing.
- Call a poison control center or doctor for treatment advice.

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- · Do not give anything by mouth to an unconscious person.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION. Causes moderate eye irritation. Avoid contact with skin, eyes and clothing. Harmful if inhaled or absorbed through the skin. Avoid breathing vapors or spray mist. Wear protective eyewear and protective clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using the toilet. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

Commercial and Industrial uses: This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

Residential use: This pesticide is toxic to fish. Do not contaminate water by cleaning of equipment or disposal of pesticide. Do not apply directly to water.

De-activation required during clean up if a spill occurs. De-activation of [EnviroSystems® BioShield® 75] [this product] can be achieved by the addition of anionic surfactant (such as soap, sulfonates, sulfates) in quantity equivalent to that of [EnviroSystems® BioShield® 75] [this product].

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STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

Pesticide Storage: Store in original, tightly closed containers below 30°C (86°F) and above 0°C (32°F) in a secure area inaccessible to children and away from food or feed.

Pesticide Disposal:

{Residential use} Wastes resulting from the use of this product may be disposed on site. {Commercial/industrial use} Wastes resulting from the use of this product may be disposed on site or at an approved waste disposal facility.

Container Handling:

(Residential use) Securely wrap original container in several layers of newspaper and discard in trash.

{Commercial/industrial use} Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying.

{Insert applicable triple rinse instructions for container size below}

(5 gal or less)

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

(More than 5 gal)

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

Then offer for recycling if available, or puncture and dispose in a sanitary landfill, or by other procedures approved by state and local authorities.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Wear protective eyewear (goggles or face shield), gloves, and protective clothing when using this product. Dry treated areas and articles such as clothing before use. Remove children and pets from treated area until completely dry. Clean surfaces prior to application.

EnviroSystems® BioShield® 75 in a READY TO USE product only.

Notes:

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Commercial and Industrial Applications

The active ingredient in EnviroSystems® BioShield® 75 is effective against odor causing bacteria and fungi (mold and mildew), bacteria and fungi (mold and mildew) which cause staining and discoloration, and algae as a static agent, EnviroSystems® BioShield® 75 can be used as a final bacteriostatic finish on the following items to impart bacteriostatic/fungistatic (mold and mildew) and algaestatic activity.

- Air filters for furnaces, air-conditioners, air purification devices, automobiles, recirculating air handling systems
- Air filters/materials
- Aguarium filter material
- Bed sheets, blankets, and bedspreads
- Buffer pads (abrasive and polishing)
- Carpets and draperies
- Concrete additive for sewer pipes, manholes and concrete sewer structures; not to be used in treatment of storm drains
- Concrete additive for repair and renewal of sewer pipes and manholes and concrete sewer structures (Not to be used in treatment of storm drains)
- Fiberfill for upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, polyester, rayon, or wool
- Fiberglass ductboard
- Fire hose fabric
- Humidifier belts
- Mattress pads and ticking
- Men's underwear and outerwear
- Non-woven disposable diapers
- Non-woven polyester
- Outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos)
- Polyurethane and cellulose foam for household, industrial, and institutional mops
- · Polyurethane and polyethylene foam, when covered
- Polyurethane foam for packaging and cushioning
- Polyurethane foam used as a growth medium.
- Pre-moistened towelettes and tissue wipes (these do not impart pesticidal properties)
- Roofing materials defined as shingles, roofing granules, wood shakes, felt, stone and synthetic overcoats
- Sand bags, tents, tarpaulins, sails and ropes
- Athletic and casual shoes
- Shoe insoles
- Shower curtains
- Socks comprised of nylon, nylon/orlon, cotton/nylon, linen/Lycra, acrylic/polypropylene/nylon/Lycra, wool/silk/nylon/Lycra and wool/acrylic/nylon/Lycra
- Throw rugs
- Toweling made of 100 percent cotton, 100 percent polyester, and blends of the two fibers
- · Toilet tank and seat covers
- Umbrellas

Notes:

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- Upholstery made of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, and wool
- · Vacuum cleaner bags and filters
- Vinyl paper-wallpaper
- Disposable wiping cloths that can be used for multiple purposes such as dusting or washing furniture, cars, walls, windows, floors, exterior surfaces of appliances, counter tops; the wiping cloths do not impart pesticide properties
- Women's hosiery
- Women's intimate apparel

EnviroSystems® BioShield® 75 is a READY TO USE product only. [EnviroSystems® BioShield® 75] [This product] can be applied to organic or inorganic substrates by brushing, dipping, padding, soaking, spraying or by using foam finishing techniques.

The substrate can be dried at temperatures from ambient to a maximum of 160°C (320°F) to effect complete condensation of silanol groups and to remove water, solvents and/or traces of methanol from hydrolysis. Optimum application and drying conditions, such as time and temperature, should be determined for each application before use. If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.

EnviroSystems® BioShield® 75 when used as a concrete additive is added directly during concrete preparation. Use 40 fluid ounces per cubic feet of concrete. Addition of EnviroSystems® BioShield® 75 reduces deterioration of sewer pipes and manholes by inhibiting microbiologically induced corrosion.

Commercial applications in, offices, automobiles and the following institutions; schools, hospitals, daycare centers, churches, correctional facilities

The active ingredient in EnviroSystems® BioShield® 75 is effective against odor causing bacteria and fungi (mold and mildew), bacteria and fungi (mold and mildew) which cause staining and discoloration, and algae as a static agent. EnviroSystems® BioShield® 75 can be used as a final bacteriostatic finish on the following items to impart bacteriostatic/fungistatic (mold and mildew) and algaestatic activity.

- Air filters for furnaces, air-conditioners, air purification devices, automobiles, recirculating air handling systems
- Air filters/materials
- Aquarium filter material
- · Bed sheets, blankets, andbedspreads
- Buffer pads (abrasive and polishing)
- Carpets and draperies
- Fiberfill for upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, polyester, rayon, or wool
- Fiberglass ductboard
- Fire hose fabric
- Humidifier belts
- Mattress pads and ticking
- · Men's underwear and outerwear
- Non-woven polyester

Notes:

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- Outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos)
- Polyurethane and cellulose foam for household, industrial, and institutional mops.
- · Polyurethane and polyethylene foam, when covered
- Polyurethane foam for packaging and cushioning
- Polyurethane foam used as a growth medium
- Roofing materials defined as shingles, roofing granules, wood shakes, felt, stone and synthetic overcoats
- Sand bags, tents, tarpaulins, sails and ropes
- Athletic and casual shoes
- Shoe insoles
- · Shower curtains
- Socks comprised of nylon, nylon/orlon, cotton/nylon, linen/Lycra, acrylic/polypropylene/nylon/Lycra, wool/silk/nylon/Lycra and wool/acrylic/nylon/Lycra
- Throw rugs
- Toweling made of 100 percent cotton, 100 percent polyester, and blends of the two fibers
- Toilet tank and seat covers
- Umbrellas
- Upholstery made of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyelefins, polypropylene, rayon, spandex, vinyl, and wool
- Vacuum cleaner bags and filters
- Vinyl paper-wallpaper
- Disposable wiping cloths that can be used for multiple purposes such as dusting or washing furniture, cars, walls, windows, floors, exterior surfaces of appliances; the wiping cloths do not impart pesticide properties
- Women's hosiery
- Women's intimate apparel

For Pump Spray Application: EnviroSystems® BioShield® 75 is a READY TO USE product only. Using pump sprayer, spray entire area 4" – 6" from the surface making sure the surface is completely covered. Apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test for staining and color-fastness of fabrics and carpets by treating and drying a small, concealed area prior to application. One gallon of EnviroSystems® BioShield® 75 treats approximately 200 square feet. When treating coarser substrates, more EnviroSystems® BioShield® 75 may be required due to absorption. A fan may be used to assist in drying carpeting.

For Commercial Spray Application: EnviroSystems® BioShield® 75 is a READY TO USE product only. For commercial application equipment (i.e. carpet/upholstery steamers, rotary jet extraction cleaners, pressure sprayers) apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test for staining and color-fastness of fabrics and carpets by treating and drying a small, concealed area prior to application. One gallon of EnviroSystems® BioShield® 75 treats approximately 200 square feet. When treating coarser substrates, more EnviroSystems® BioShield® 75 may be required due to absorption. Dry carpet areas and surfaces before re-entry and dry articles before use. A fan may be used to assist in drying carpeting.

For Dipping/Soaking Application: EnviroSystems® BioShield® 75 is a READY TO USE product only. Use appropriate sized wash basin or tub for dipping/soaking the item to be treated. One gallon of EnviroSystems® BioShield® 75 treats approximately 200 square feet of items of hard surface or approximately 8 pounds of fabric. The item must be fully submerged in EnviroSystems® BioShield® 75 for at least 3 minutes. Remove item and dry. Test for staining

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Page 6 of 14 01/10/2018 and color-fastness of fabrics by treating and drying a small, concealed area prior to application. Do not reuse solution after dipping/soaking.

The substrate can be dried at room temperatures or at temperatures to a maximum of 160°C (320°F), for example in a clothes dryer. Remove excess liquid before attempting to dry in a clothes dryer. If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.

**FOR USE AS AN ANTIMICROBIAL TO PRESERVE FINISHED FOOD CONTACT ARTICLES SUBJECT TO FDA REGULATIONS.

Incorporate EnviroSystems® BioShield® 75 Microbiostatic Agent as an antimicrobial additive to coat the polymeric manufactured products listed below that are used for manufacturing, processing, packing, packaging, transporting, handling and/or holding food or water if such use is not intended to have any effect in the food or water itself. Do not incorporate BioShield® 75 Microbiostatic into any food or water contact application listed on this label unless the substance is approved, with associated use conditions, for food or water contact in 21 CFR 174-186 (inclusive) as amended or in the US FDA's Food Contact Substance Notification System, as amended.

Food Preparation Surfaces

This Food Contact Substance (FCS) can be used as an additive without food or beverage type or temperature limitation, in food or beverage preparation and processing surfaces (where FCS is applied to the surface as a coating).

Use:

Food contact coatings, films and laminates.

Products:

- Appliances, equipment and utensils, (used in preparing and processing of food products for human and animal consumption)
- Barrier fabrics
- Building materials and components, (used in food preparation and processing areas)
- Collection and storage equipment (such as conveyor systems, piping systems, silos, tanks, and process vessels made from any material)
- Cookware made from any material
- Countertops and cutting boards made from composite materials, stainless steel, laminates
- Food wrap (including coated deli paper, coated food interleaves, plastic wrap, polystyrene and plastic trays, aluminum foil)
- General purpose containers of any material for short and long term storage
- Glazing for cement tiles
- Glazing for vitreous china used in plumbing fixtures such as countertops, sinks and other vessels
 - Industrial equipment and machinery for the preparation, processing or transportation of food and beverage products
- Natural and synthetic fibers and fabrics in any combination of compositions packaging (made from paper, plastics or metals)
- Paper products (such as wipes, tissues, wall coverings, towels)
- Plastic film (of any weight and composition)
- Sinks and other vessels used for cleaning or transporting food and beverage products

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Maximum Concentration:

1% active weight percent of resin, laminate, or coating.

One gallon of EnviroSystems® BioShield® 75 treats approximately 200 square feet of item.

Polymeric Tubing for Beverages

Polymeric tubing for transfer of beverages and drinking water.

Use:

Food contact molded plastic and metal parts.

Products:

- Beverage dispensing equipment tubing
- Beverage processing equipment tubing
- Holding tanks
- Pump

Maximum Concentration:

1% active weight percent of finished tubing.

One gallon of EnviroSystems® BioShield® 75 treats approximately 200 square feet of the item.

Activated Carbon Water Filters

Repeat use activated carbon water filters and other water filter media.

Use:

Process and drinking water filter

Products:

 Activated carbon water filters (and synthetic woven or non-woven media, zeolite and other natural media)

Maximum Concentration:

1.0% active weight percent of the carbon block.

One gallon of EnviroSystems® BioShield® 75 treats approximately 0.4 cubic feet of activated carbon block or filter media.

Application:

EnviroSystems® BioShield® 75 is a READY TO USE product only. [EnviroSystems® BioShield® 75] [This product] can be applied to organic or inorganic substrates by brushing, dipping, padding, soaking, spraying or by using foam finishing techniques.

The substrate can be dried at temperatures from ambient to a maximum of 160°C (320°F) to effect complete condensation of silanol groups and to remove water, solvents and/or traces of methanol from hydrolysis. Optimum application and drying conditions, such as time and temperature, should be determined for each application before use. If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.

Residential Applications

The active ingredient in EnviroSystems® BioShield® 75 is effective against odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae as a

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	Pest controlled	Method of Application
Bedsheets, blankets, bedspreads, curtains, draperies (washable only), underwear, socks, intimate apparel, hosiery, throw rugs, toweling, toilet tank covers, shower curtains, shoe insoles, outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos). EnviroSystems® BioShield® 75 can be applied to fabrics made of acetates, acrylics, cotton, fiberglass, linen, Lycra, nylon, orlon, polyester, polyethylene, rayon, silk, spandex, vinyl, and wool.	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	DIP/SOAK: Use appropriate sized wash basin or tub for dipping/soaking the item you are treating. One gallon of EnviroSystems® BioShield® 75 treats approximately 200 square feet of items of hard surface or approximately 8 pounds of fabric. The item must be fully submerged in EnviroSystems® BioShield® 75 for at least 3 minutes. Remove item and wring excess liquid. Drying may be attained by dripping dry or wringing excess liquid from treated item. For larger items (e.g., bedspreads, curtains, draperies). Place in washing machine on spin cycle to aid in the removal of excess liquid. Test staining and color-fastness of fabric and carpets by treating and drying a small concealed area prior to application. Do not reuse solution after dipping/soaking. Dry treated articles before use. Substrates can be hang-dried at room temperature or at temperatures to a maximum of 160°C (320°F), (for example in a clothes dryer). Remove excess liquid before attempting to dry in a clothes dryer. If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return. SPRAY: Clean surface prior to application. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"-6" from the surface making sure the surface is completely covered. One gallon of EnviroSystems® BioShield® 75 treats approximately 200 square feet. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. Test staining and color-fastness of fabric by treating and drying a small, concealed area prior to application. If necessary, reapply EnviroSystems® BioShield® 75 every three months or when oder, staining and discoloration due to bacteria, mold stains and mildew stains return.

[Bracketed Text] is optional text.
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	Pest controlled	Method of Application
Air filters and air filter material for Furnaces, air conditioners Air purification systems Automobiles Recirculating air handling systems Vacuum cleaner filters Aquariums	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew), and algae.	SPRAY: When treating filters, remove filter from the unit. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4" – 6" from the surface making sure the surface is completely covered. One gallon of EnviroSystems® BioShield® 75 treats approximately 200 square feet. Apply and then let stand until dry. If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains and algae stains return.
	Pest controlled	Method of Application
Carpeting	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	SPRAY: Apply to clean carpet surface. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4" –6" from the surface making sure the surface is completely covered. For rotary jet extraction cleaners and carpet steamers, add EnviroSystems® BioShield® 75 directly to the cleaning tank, then operate the equipment in accordance with manufacturer's instructions. Apply and then let stand until dry. Test staining and color-fastness of carpets by treating and drying a small, concealed area prior to application. EnviroSystems® BioShield® 75 treats approximately 200 square feet per gallon (50 square feet per quart). When treating coarser substrates (e.g. wool carpeting), more EnviroSystems® BioShield® 75 may be required due to absorption. Dry carpet areas and surfaces before re-entry. A fan may be used to assist in drying carpeting. Remove children and pets from treated areas until completely dried. If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains and mildew stains return.

Notes:

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	Pest controlled	Method of Application
Mattress pad and mattress ticking and upholstery composed of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, wool; fiberfill to be used in upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, rayon or wool.	Odor causing bacteria, bacteria which cause staining And discoloration, and fungi (mold and mildew)	SPRAY: Clean surfaces prior to application. Using a trigger pump sprayer, spray the entire surface area 4" – 6" from the surface making sure the surface is completely covered. One gallon of EnviroSystems® BioShield® 75 treats approximately 200 square feet. Apply and then let stand until dry or let stand 3 minutes and wipe dry with a cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test staining and color-fastness of fabric by treating and drying a small, concealed area prior to application. When applying to mattress pads and ticking do not soak. Remove children and pets from treated area until completely dried. If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains and mildew stains return.
	Pest controlled	Method of Application
Tents, tarpaulins, sails, ropes	Odor causing bacteria, bacteria which cause staining And discoloration, fungi (mold and mildew) and algae.	SPRAY: Clean surface prior to application. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4" – 6" from the surface making sure the surface is completely covered. One gallon of EnviroSystems® BioShield® 75 treats approximately 200 square feet. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test staining and color-fastness of fabric by treating and drying a small, concealed area prior to application.
		If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains and algae stains return.
		DIP/SOAK: Use appropriate sized wash basin or tub for dipping/soaking the item you are treating. One gallon of EnviroSystems® BioShield® 75 treats approximately 200 square feet of items of hard surface or approximately 8 pounds of fabric. The item must be fully submerged in EnviroSystems® BioShield® 75 for at least 3 minutes. Remove item and wring excess liquid. Do not reuse solution after dipping/soaking. Dry treated articles before use. Substrates can be hang-dried at room temperature or at temperatures to a maximum of 160°C (320°F); (for example in a clothes dryer). Remove excess liquid before attempting to dry in a clothes dryer.

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		If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.
	Pest controlled	Method of Application
Roofing materials (such as shingles, roofing granules, wood shakes, felt, stone, synthetic overcoats)	Odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae.	SPRAY: Make sure the roof is clean prior to application. Using a pressure sprayer, spray the entire surface area 6"-12" from the surface making sure the surface is completely covered. After applying EnviroSystems® BioShield® 75 let stand until dry. EnviroSystems® BioShield® 75 treats approximately 200 square feet of roofing per gallon (50 square feet per quart). If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.
	Pest controlled	Method of Application
Buffer pads (polishing and abrasive), Polyurethane and cellulose foam for household mops, vacuum cleaner bags, umbrellas, casual shoes, athletic shoes	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	SPRAY: Clean surface prior to application. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4" – 6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. EnviroSystems® BioShield® 75 treats approximately 200 square feet. If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains and mildew stains return.
	Pest controlled	Method of Application
Tubs, glazed tiles, vanity tops, shower curtains, shower stalls (areas), sinks, washable walls, wall paper, floors, window sills, cabinets, garbage cans, appliances, refrigerators (exterior), fiberglass, formica, glazed tiles, glazed porcelain, synthetic marble, plastic, vinyl.	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	SPRAY: Using a trigger pump sprayer, spray the entire surface area 4" – 6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. EnviroSystems® BioShield® 75 treats approximately 200 square feet. If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.

Imparts microbiostatic properties.

Use on carpet and upholstery to inhibit odor causing bacteria and fungi (mold and mildew), bacteria and fungi (mold and mildew) which cause staining and discoloration.

Unscented.

Use on carpet and upholstery to inhibit the growth of odor causing bacteria.

Use on carpet and upholstery to inhibit the growth of bacteria which cause staining and discoloration.

Use on carpet and upholstery to inhibit the growth of fungi (mold and mildew) which cause staining and discoloration.

Use on carpet and upholstery to inhibit the growth of odor causing bacteria and fungi (mold and mildew), bacteria and fungi (mold and mildew) which cause staining and discoloration.

Provides an invisible microbiostatic coating to inhibit the growth of odor causing bacteria.

Provides an invisible microbiostatic coating to inhibit the growth of bacteria which cause staining and discoloration.

Provides an invisible microbiostatic coating to inhibit the growth of fungi (mold and mildew) which cause staining and discoloration.

Provides an invisible microbiostatic coating to inhibit the growth of algae.

Provides an invisible microbiostatic coating to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae.

Prevents deterioration caused by bacteria and fungi (mold and mildew) which cause staining and discoloration.

Inhibits deterioration caused by bacteria.

Resists development of microbial odors.

Resists development of stains and discoloration due to bacteria.

Resists development of stains due to fungi (mold and mildew) which cause staining and discoloration.

Resists stains due to algae.

Resists development of microbial odors, stains and discoloration due to bacteria and fungi (mold and mildew), bacteria and fungi (mold and mildew) which cause staining and discoloration and algae.

Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria.

Provides/creates an invisible barrier to inhibit the growth of bacteria which cause staining and discoloration.

Provides/creates an invisible barrier to inhibit the growth of fungi (mold and mildew) which cause staining and discoloration.

Provides/creates an invisible barrier to inhibit the growth of algae.

Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria and fungi (mold and mildew), bacteria and fungi (mold and mildew) which cause staining and discoloration and algae.

Inhibits the growth of odor causing bacteria between cleanings.

Inhibits the growth of bacteria which cause staining and discoloration between cleanings.

Inhibits the growth of fungi (mold and mildew) which cause staining and discoloration between cleanings.

Inhibits the growth of algae between cleanings.

Inhibits the growth of odor causing bacteria and fungi (mold and mildew), bacteria and fungi (mold and mildew) which cause staining and discoloration and algae between cleanings.

Mold, mildew, odor protector and inhibitor.

EnviroSystems® BioShield® 75 is an antimicrobial agent effective against odor causing bacteria. EnviroSystems® BioShield® 75 is an antimicrobial agent effective against bacteria which cause staining and discoloration.

EnviroSystems® BioShield® 75 is an antimicrobial agent effective against fungi (mold and mildew) which cause staining and discoloration.

EnviroSystems® BioShield® 75 is an antimicrobial agent that inhibits mildew.

EnviroSystems® BioShield® 75, an antimicrobial agent, controls the source of odors on surfaces in the home, in the bathroom, in the kitchen.

Notes:

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Page 13 of 14 01/10/2018 Bacteriostatic, fungistatic (mold and mildew), algaestatic.

EnviroSystems® BioShield® 75, an antimicrobial agent, inhibits smelly odors caused by mold and mildew that can grow even in the cleanest of homes.

EnviroSystems® BioShield® 75, an antimicrobial agent, inhibits the growth of odor causing bacteria.

Effective on hard non-porous washable bathroom and kitchen surfaces and fixtures around the home.

Effective on modern hard non-porous washable surfaces made of fiberglass, glazed porcelain, Formica®, stainless steel, synthetic marble.

Durable antimicrobial.

Approved for use on food contact surfaces.

FOR MORE INFORMATION CONCERNING THIS PRODUCT, PLEASE CONSULT THE SAFETY DATA SHEET (SDS). THE SDS CAN BE OBTAINED BY CONTACTING:

IndusCo, Ltd. 2319 Joe Brown Drive Greensboro, NC 27405 (336) 375-7555 www.induscoltd.com

IMPORTANT: WARRANTY AND DISCLAIMER INFORMATION

IndusCo, Ltd warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated in this bulletin when used in accordance with directions under normal conditions of use; but this warranty of fitness for a particular purpose does not extend to the use of this product contrary to bulletin instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to the seller, and buyer assumes the risk of any such use.

INDUSCO, LTD SPECIFICALLY DISCLAIMS ANY OTHER EXPRESS OR IMPLIED WARRANTY, INCLUDING THE WARRANTY OF MERCHANTABILITY.

Notes:

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Daniels, Joseph

From:

Olivia D. Laird <laird1olivia@aol.com>

Sent:

Friday, December 1, 2017 2:45 PM

To:

Daniels, Joseph

Subject:

Fwd: Clean Version of BioShield 75 Food Contact Surface Label

Attachments:

BioShield75 FoodContactSurface Draft 12-1-2017.docx

Joseph:

They have supplied the attached label in response to your request. Questions or concerns let me know

Olivia D. Laird, President/Owner Laird's Regulatory Consultants, Inc.

Phone: (703) 669-0509

Email Address: Laird1Olivia@aol.com

The future doesn't just happen, it is created...Our destiny is not in the stars, but in ourselves through our Lord Jesus the Christ. We must follow in the wake of those who have gone before us, but what we do and where we go is ultimately up to us. The attitude of initiative is an on-going state of exploration that is never finished...a journey that never onds.

----Original Message-----

From: Laura Chambers <laura.chambers@induscoltd.com>

To: Olivia D. Laird <laird1olivia@aol.com>

Cc: Kevin Parrish <kevin.parrish@induscoltd.com>; Alastair Irving <alastair.irving@induscoltd.com>

Sent: Fri, Dec 1, 2017 2:16 pm

Subject: Clean Version of BioShield 75 Food Contact Surface Label

Good Afternoon Olivia,

Thank you for taking our calls today and clarifying what Joseph needs.

Please see the attached clean version of our BioShield 75 EPA label to include the food contact surfaces.

If there is anything else needed, let us know.

thanks

Laura Chambers
Technical Director

INDUSCO, LTD.

2319 Joe Brown Drive Greensboro, NC 27405 336.375.7555

New email address: Laura.Chambers@IndusCoLtd.com

Daniels, Joseph

From:

Olivia Laird < laird1olivia@aol.com> Friday, December 1, 2017 12:54 AM

Sent: To:

Daniels, Joseph

Subject:

Re: EPA Reg. No. 53053-24

Joseph welcome back. I will get you a clean label

Sent from my iPhone

On Nov 30, 2017, at 3:07 PM, Daniels, Joseph < Daniels. Joseph@epa.gov > wrote:

Good afternoon. I cannot seem to locate a clean electronic version of this label. Can you please submit the label and I can work on completing this action. Thank you!

Joe

From: Olivia D. Laird [mailto:laird1olivia@aol.com]

Sent: Friday, October 6, 2017 4:12 PM

To: Daniels, Joseph < Daniels. Joseph@epa.gov> Cc: Miederhoff, Eric < Miederhoff. Eric @epa.gov>

Subject: Fwd: EPA Reg. No. 53053-24

The data matrices you requested foe Indusco are attached. The company that Indusco contacted for use of data is Gelest because they are the only company with this claim. Thank you

Olivia D. Laird, President/Owner Laird's Regulatory Consultants, Inc.

Phone: (703) 669-0509

Email Address: Laird1Olivia@aol.com

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----Original Message----

From: Cinda Bell < cbell@scireg.com>

To: Laura Chambers < Laura@indusCoLtd.com >; Olivia D. Laird < laird1olivia@aol.com >; mike.bralkowski <mike.bralkowski@amail.com>: tammv <tammv@induscoltd.com>; alirving <alirving@xtra.co.nz>;

doctorierrymoore ·

Sent: Thu, Oct 5, 2017 9:18 am

Subject: RE: Fwd: EPA Reg. No. 53053-24

Attached is the latest data matrix that was submitted

Kind regards.

Cinda

From: Laura Chambers [mailto:Laura@indusCoLtd.com]

Sent: Thursday, October 05, 2017 8:10 AM

Personal privacy information

To: Olivia D. Laird; mike.bralkowski@gmail.com; tammy@induscoltd.com; alirving@xtra.co.nz;

Cinda Bell

Subject: Re: Fwd: EPA Reg. No. 53053-24

Good Morning,

The only letter sent out was to Gelest.

thanks

Laura

On 10/4/2017 6:15 PM, Olivia D. Laird wrote:

This is a request from the agency. Can you provide this information? I don't have a matrix for Indusco.

Olivia D. Laird, President/Owner Laird's Regulatory Consultants, Inc.

Phone: (703) 669-0509

Email Address: Laird10livia@aol.com

The future doesn't just happen, it is created. Our destiny is not in the sters, but in ourselves through our Lord Jesus the Christ. We must follow in the wake of those who have gone before us, but what we do and where we go is ultimately up to us. The attitude of initiative is an on going state of exploration that is never finished...e journey that never ends.

----Original Message----

From: Daniels, Joseph < Daniels. Joseph@epa.gov>

To: Olivia D. Laird aol.com

Cc: Miederhoff, Eric < Miederhoff. Eric@epa.gov>

Sent: Wed, Oct 4, 2017 2:10 pm Subject: RE: EPA Reg. No. 53053-24

Good afternoon. I have one more thing to ask for with this action. Can you just send in your generic data matrix that specifically includes the companies that you sent offer to pay letters to. Thank you!

From: Olivia D. Laird [mailto:laird1olivia@aol.com]
Sent: Thursday, September 28, 2017 3:44 PM
To: Daniels, Joseph < Daniels, Joseph@epa.gov>

Subject: Fwd: EPA Reg. No. 53053-24

Good Day Joseph:

Per your request Please find the attached MOS.

Olivia D. Laird, President/Owner Laird's Regulatory Consultants, Inc.

Phone: (703) 669-0509

Email Address: Laird1Olivia@aol.com

The future doesn't just happen, it is created...Our destiny is not in the stars, but in ourselves through our Lord Jesus the Christ. We must follow in the wake of those who have gone before us, but what we do and where we go is ultimately up to us. The altitude of initiative is en on going state of exploration that is never finished...e journey that never ends.

Daniels, Joseph

From:

Olivia D. Laird < laird1olivia@aol.com>

Sent:

Wednesday, September 27, 2017 10:32 AM

To: Cc: Daniels, Joseph

Culatara.

Miederhoff, Eric

Subject:

Re: EPA Reg. No. 53053-24

Thank you so very much. I will get the form to you

Olivia D. Laird, President/Owner Laird's Regulatory Consultants, Inc.

Phone: (703) 669-0509

Email Address: Laird1Olivia@aol.com

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----Original Message----

From: Daniels, Joseph < Daniels. Joseph@epa.gov>

To: Olivia D. Laird <laird1olivia@aol.com>

Cc: Miederhoff, Eric < Miederhoff. Eric@epa.gov>

Sent: Wed, Sep 27, 2017 10:28 am Subject: RE: EPA Reg. No. 53053-24

Good morning. It looks like we got a green light from the inerts branch. Can you please just send in a certification with respect to data citation form and we should be able to continue on with this review. Thanks!

Joe

From: Olivia D. Laird [mailto:laird1olivia@aol.com]
Sent: Thursday, September 21, 2017 2:10 PM
To: Daniels, Joseph < Daniels.Joseph@epa.gov >
Cc: Miederhoff, Eric < Miederhoff. Eric@epa.gov >

Subject: Re: EPA Reg. No. 53053-24

Thank you that would be great

Olivia D. Laird, President/Owner Laird's Regulatory Consultants, Inc.

Phone: (703) 669-0509

Email Address: Laird1Olivia@aol.com

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----Original Message----

From: Daniels, Joseph < Daniels, Joseph@epa.gov>

To: Olivia D. Laird laird1olivia@aol.com

Cc: Miederhoff, Eric < Miederhoff, Eric@epa.gov>

Sent: Thu, Sep 21, 2017 1:45 pm Subject: EPA Reg. No. 53053-24

Good afternoon. After checking into those 40 CFR references, it appears as if the inert in Alt CSF 3 should be okay. I will, however, check in with our inerts branch to see why it was approved as only non-food use in our database before finalizing anything and get back to you as soon as I hear back.

Joe

From: Olivia D. Laird [mailto:laird1olivia@aol.com]
Sent: Thursday, September 21, 2017 12:58 PM
To: Daniels, Joseph < Daniels, Joseph@epa.gov>

Subject: Fwd: Surfactants

Joseph:

I am forwarding this on to you from the registrant, hopefully this will address the concerns for the chemical. Let me know if you still need further clarification. Also I understand that SciReg is handling the DCI for Indusco so they also may be contacting you on some of the clarification issues for them.

Thank you

Olivia D. Laird, President/Owner Laird's Regulatory Consultants, Inc.

Phone: (703) 669-0509

Email Address: Laird1Olivia@aol.com

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----Original Message----

From: Laura Chambers < Laura@IndusCoLtd.com>

To: Michael Bralkowski <mike.bralkowski@gmail.com>; Olivia D. Laird <laird1Olivia@aol.com>; Cinda Bell

<cbell@SciReg.com>

Cc: Alastair Irving <alirving@xtra.co.nz> Sent: Thu, Sep 21, 2017 8:12 am

Subject: Re: Surfactants

Olivia.

Are you explaining this to the AD group? (see Mike's email below) The EPA has all this info. I have asked Cinda to contact Joseph, stating she may be able to explain a this better than I can. With both of you explaining, the information should be understood.

thanks Laura

On 9/20/2017 5:40 PM, Michael Bralkowski wrote:

Laura

Your explanation may need to be re written more clearly.
You have sent some information that may be easy for you with chemical background to explain but not to a non chemist. You may be talking to non chemists.

I would specifically site your chemistry listed in CSF and the CAS # found in the list below. Does the SDS for have for indirect food surface contact?

180.940 Tolerance exemptions for active and <u>inert</u> ingredients for use in antimicrobial <u>formulations</u> (Food-contact surface sanitizing solutions).

Residues of the following chemical substances are exempted from the requirement of a tolerance when used in accordance with good manufacturing practice as ingredients in an antimicrobial pesticide formulation, provided that the substance is applied on a semi-permanent or permanent food-contact surface (other than being applied on food packaging) with adequate draining before contact with food.

(a) The following chemical substances when used as ingredients in an antimicrobial <u>pesticide formulation</u> may be applied to: Food-contact surfaces in public eating places, dairy-processing equipment, and food-processing equipment and utensils.

Pesticide Chemical	CAS Reg. No.
Acetic acid	64-19-7
Allyl cylcohexylpropionate	2705-87-5

α-alkyl-ω-hydroxypoly (oxypropylene) and/or poly (oxyethylene) polymers where the alkyl chain contains a minimum of six carbons (CAS Reg. No 251553-55-6)

9002-92-0; 9004-95-9; 9004-98-2; 9005-00-9; 9035-8
43-1; 9040-05-5; 9043-30-5; 9087-53-0; 25190-05-0;
4; 251553-55-6; 26183-52-8; 26468-86-0; 26636-39-2
79-2; 31726-34-8; 34398-01-1; 34398-05-5; 37251-6;
01-6; 37311-02-7; 37311-04-9; 39587-22-9; 50861-6;
17-8; 52609-19-5; 57679-21-7; 59112-62-8; 60828-7;
89-1; 61791-13-7; 61791-20-6; 61791-28-4; 61804-348-7; 62648-50-4; 63303-01-5; 63658-45-7; 63793-6;
24-3; 64415-25-4; 64425-86-1; 65104-72-5; 65150-8;
15-0; 67254-71-1; 67763-08-0; 68002-96-0; 68002-9640-8; 68154-96-1; 68154-97-2; 68154-98-3; 68155-06;
24-1; 68238-81-3; 68238-82-4; 68409-58-5; 68409-56-

45-2; 68439-46-3; 68439-48-5; 68439-49-6; 68439-50 53-2; 68439-54-3; 68458-88-8; 68526-94-3; 68526-9: 13-3; 68551-14-4; 68603-20-3; 68603-25-8; 68920-60 66-6; 68951-67-7; 68954-94-9; 68987-81-5; 68991-41 18-9; 69013-19-0; 69227-20-9; 69227-21-0; 69227-2: 27-5; 70879-83-3; 70955-07-6; 71011-10-4; 71060-5 65-0; 72108-90-8; 72484-69-6; 72854-13-8; 72905-8' 34-0; 74432-13-6; 74499-34-6; 78330-19-5; 78330-20 23-1; 79771-03-2; 84133-50-6; 85422-93-1; 97043-9 102782-43-4; 103331-86-8; 103657-84-7; 103657-85 103819-03-0; 106232-83-1; 111905-54-5; 116810-31 116810-33-4; 120313-48-6; 120944-68-5; 121617-09 126950-62-7; 127036-24-2; 139626-71-4; 152231-44 157627-86-6; 157627-88-8; 157707-41-0; 157707-43 160875-66-1; 160901-20-2; 160901-09-7; 160901-19 161025-22-5; 166736-08-9; 169107-21-5; 172588-43 196823-11-7; 287935-46-0; 288260-45-7; 303176-75

Michael Bralkowski
Redwine Consulting Inc
150 N Research Campus Dr
Suite 3304
Kannapolis NC 28081
cell 336-341-6686
mike.bralkowski@gmail.com

Laura Chambers Technical Director IndusCo, Ltd. 336-375-7555 Laura@IndusCoLTD.com

Daniels, Joseph

From:

Olivia D. Laird <laird1olivia@aol.com>

Sent:

Wednesday, September 20, 2017 4:26 PM

To: Subject: Daniels, Joseph; Miederhoff, Eric

subject:

Fwd: EPA Reg. No. 53053-24

Attachments:

40 CFR 180.940 - Tolerance exemptions for active and inert ingredients for use in antimicrobial formulations (Food-contact surface sanitizing solutions). _ US Law _ LII _ Legal Information Institute.html; 40 CFR 180.930 - Inert ingredients applied to animals; exemptions from the requirement of a tolerance. _ US Law _ LII _ Legal Information Institute.html; 40 CFR 180.910 - Inert ingredients used pre- and post-harvest; exemptions from the requirement of a tolerance. _ US Law _ LII _ Legal Information

Institute.html

Joseph:

Please see the comment below from the registrant. Let me know if this will help as well as the attached

Olivia D. Laird, President/Owner Laird's Regulatory Consultants, Inc.

Phone: (703) 669-0509

Email Address: Laird10livia@aol.com

The future doesn't just happen, it is created...Our destiny is not in the stars, but in ourselves through our Lord Jesus the Christ. We must follow in the wake of those who have gone before us, but what we do and where we go is ultimately up to us. The attitude of initiative is an on-going state of exploration that is never finished...a journey that never ends.

----Original Message----

From: Laura Chambers <Laura@IndusCoLtd.com>

To: Olivia D. Laird aird: olivia D. Laird aird: laird10livia@aol.com; mike.bralkowski <mike.bralkowski <mike.bralkowski@gmail.com; tammy

<tammy@induscoltd.com>; alirving <alirving@xtra.co.nz>; doctorjerrymoore

Sent: Wed, Sep 20, 2017 3:37 pm

Subject: Re: Fwd: EPA Reg. No. 53053-24

Dear Olivia,

The Basic and Alt-2 are not used right now, due to our preference in vendors. Not to worry.

Below he states that CSF Alt#1 can be completely cleared for food

use, this is great.

We want CSF Alt#3 completely cleared also. I believe the inert that may be in question in Alt#3 is exactly the same as in Alt #1, but manufactured by a different vendor. This will be the surfactant. Previously we were advised that... in three separate CFR citations (40 CFR 180.910; 180.930; and 180.940). 180.940 actually has direct bearing here as that citation is clearances for

use in anti-microbial applications related to food-contact surfaces. commented, the CFR citations always trump the Inert Finder though she is a bit baffled as to why the database does not show this material... Please see the attached CFR citations. You can find the CAS number in each list under a-alkyl-w-hydroxy poly and/or poly polymers where alkyl chain contains a minimum of six carbons.

Will this help in the approval process of CSF Alt#3? thank you Laura

On 9/20/2017 2:09 PM, Olivia D. Laird wrote:

I AM FORWARDING THIS ON FROM JOSEPH AND ERIC, EPA. WHY DO YOU HAVE INERTS THAT HAVE NOT BEEN CLEARED? I ADVISED HIM TO APPROVE THE BASIC FORMULATION AND YOU CAN WORK ON THE COMPONENTS THAT HAVE NOT BEEN CLEARED AT A LATER DATE

Olivia D. Laird, President/Owner Laird's Regulatory Consultants, Inc.

Phone: (703) 669-0509

Email Address: Laird1Olivia@aol.com

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---Original Message----

From: Daniels, Joseph < Daniels. Joseph@epa.gov>

To: Olivia Laird siard1olivia@aol.com

Cc: Miederhoff, Eric < Miederhoff. Eric@epa.gov>

Sent: Wed, Sep 20, 2017 1:02 pm Subject: EPA Reg. No. 53053-24

Good afternoon. I was just going through your action for 53053-24, and it appears that there are some inerts in the formulation that are not cleared for food use. As it stands, it looks like only alternate CSF #1 would be completely cleared for food use. The basic CSF and alternates 2-3 have inerts that would not allow to add the food use claims.

Joe Daniels
Environmental Protection Specialist
Antimicrobials Division
Office of Pesticide Programs
Environmental Protection Agency
(703) 347-8669



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

August 28, 2017

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

MS. OLIVIA D. LAIRD SCIREG, INC. INDUSCO LTD 17804 BRAEMAR PLACE LEESBURG, VA 20175

PRODUCT NAME: ENVIROSYSTEMS BIOSHIELD 75

COMPANY NAME: INDUSCO LTD OPP IDENTIFICATION NUMBER: EPA FILE SYMBOL: 53053-24 EPA RECEIPT DATE: 08/25/17

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Antimicrobials Division, Risk Management Team 31, at (703) 347-8028.

Sincerely,

Front End Processing Staff Information Services Branch

Information Technology & Resources Management Division

INDUSCO, LTD. MANUFACTURING CHEMISTS

Ms. Olivia D. Laird Laird's Regulatory Consultants, Inc.

August 1, 2017

Dear Olivia,

EnviroSystems ® BioShield®75 EPA reg # 53053-24 lists active ingredient as: Octadecylaminodimethyltrihydroxy silyl propyl ammonium chloride....0.75% and inert ingredients as ...99.25% Synonyms include 3-(trihydroxysilyl) propyldimethyloctadecyl ammonium chloride. Listed in RED Trimethoxysilyl ammonium chloride quats.

Gelest BioSafe HM4100 EPA Reg # 83019-1 lists active ingredients as 3-(trihydroxysilyl) propyldimethyloctadecyl ammonium chloride84% Inert ingredients as16%

The 3-(trihydroxysilyl) propyldimethyloctadecyl ammonium chloride exists in both products.

3-(trihydroxysilyl) propyldimethyloctadecyl ammonium chloride exists in the monomer form and the polymer form. Both are soluble in water. Upon evaporation of water the 3-(trihydroxysilyl) propyldimethyloctadecyl ammonium chloride forms a polymer binding to itself and other surfaces.

Envirosystems® BioShield® 75 when applied at 0.75% active forms a polymeric film on the surface that is non-leaching.

Gelest BioSafe HM 4100 when applied to a surface at 1.0% or less forms a polymeric film on the surface that is non-leaching.

Best regards,

Laura Chambers, Technical Director

IndusCo, Ltd.

Answers to Eric Miederhoff questions, email dated 12 July, 2017.

EnviroSystems ® BioShield®75 EPA reg # 53053-24 lists active ingredient as: Octadecylaminodimethyltrihydroxy silyl propyl ammonium chloride....0.75% and inert ingredients as ...99.25% Synonyms include 3-(trihydroxysilyl) propyldimethyloctadecyl ammonium chloride. Listed in RED Trimethoxysilyl ammonium chloride quats.

Gelest BioSafe HM4100 EPA Reg #83019-1 lists active ingredients as 3-(trihydroxysilyl) propyldimethyloctadecyl ammonium chloride84% Inert ingredients as16%

The 3-(trihydroxysilyl) propyldimethyloctadecyl ammonium chloride exists in both products.

Envirosystems® BioShield® 75 inert ingredients include:

3-(trihydroxysilyl) propyldimethyloctadecyl ammonium chloride exists in the monomer form and the polymer form. Both are soluble in water. Upon evaporation of water the 3-(trihydroxysilyl) propyldimethyloctadecyl ammonium chloride forms a polymer binding to itself and other surfaces.

Envirosystems® BioShield® 75 when applied at 0.75% active forms a polymeric film on the surface that is non-leaching.

Gelest BioSafe HM 4100 when applied to a surface at 1.0% or less forms a polymeric film on the surface that is non-leaching.

July 28, 2017

Dr Barry Arkles President Gelest Inc 11 East Steel Road Morrisville PA 19607

SUBJECT: Offer to pay compensation for use of qualified data

Certified Mail Receipt: 7011 2970 0002 7094 1170

Dear Dr Barry Arkles:

IndusCo, Ltd. is seeking to obtain additional uses for its currently registered product containing Trihydroxysilyl ammonium chloride compounds as the active ingredient, with the United States Environmental Protection Agency under the Federal Insecticide, Fungicide and Rodenticide Act, 7 U.S.C. §136 et seq. ("FIFRA"). The product contains Trihydroxysilyl ammonium chloride compounds and EPA CAS # 27668-52-6 and 199111-50-7 as its active ingredient and the proposed labeled use is to preserve food contact surfaces and articles.

IndusCo, Ltd.'s application will be submitted under the Cite-All / Selective Method of Support to satisfy the guideline requirements as indicated. Your company is just one of the companies to whom we have written this letter as your name appears on the EPA data submitters list for this chemical active ingredient.

IndusCo, Ltd. hereby offers and agrees to pay compensation, with regard to the approval of application the amendment for IndusCo, Ltd. and to the extent required by FIFRA § 3(c)(1)(D) of the Federal Insecticide, Fungicide and Rodenticide Act, for the specific data identified and confirmed as supportive of IndusCo, Ltd.'s additional uses provided you can verify that you have these data that will support our formulation by providing the study titles, along with the MRID number for each, date the study was conducted and submitted to the EPA, justification that the study was acceptable and is still valid, and the studies were conducted in accordance with GLP. If these facts are established IndusCo, Ltd. also offers to commence negotiations to determine the amount and terms of compensation, if any, to be paid for IndusCo, Ltd.'s use of any study that was provided to the EPA that is 10 to 15 years old or less.

If we do not hear from you within 30 days of receipt of this letter, IndusCo, Ltd. will assume that you do not desire compensation, or do not have any studies on file with EPA that satisfy any of the listed guideline requirements. Rest assured, however, that if you desire compensation, IndusCo, Ltd. stands ready to deal in good faith and quickly resolve any obligations it may have under FIFRA § 3(c)(1)(D).

Sincerely,

Joseph E. Mason

By: Joseph E. Mason, President

ENVIROSYSTEMS® BIOSHIELD® 75 MICROBIOSTATIC AGENT*

For use as an antimicrobial preservative under EPA and FDA Regulations to preserve food contact articles.** (Food Preparation Surfaces, Polymeric Tubing for Beverages, Activated Carbon Water Filters) subject to FDA Regulations.

KEEP OUT OF REACH OF CHILDREN

CAUTION

[See [side] [back] panels for additional precautionary statements]

Active Ingredient:	0.75%
	99.25%
	100.00%

EPA Reg. No. 53053-24 EPA Est. No. XXXX-XX-XXX

Net Contents: 32 fluid oz., 1, 5, 30, 55, 275 gal.

Lot No.:

IndusCo, Ltd. 2319 Joe Brown Drive Greensboro, NC 27405 (336) 375-7555 www.induscoltd.com

Notes:

[Bracketed Text] is optional text.

^{*} A microbiostatic agent is an agent that inhibits the growth of odor causing bacteria and fungi (mold and mildew), bacteria and fungi (mold and mildew) which cause staining and discoloration, and algae. This product does not protect users or others against food-borne or disease causing bacteria or fungi.

FIRST AID

Have the product container or label with you when calling the poison control center or doctor, or going for treatment.

IF ON SKIN:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.
- Call a poison control center or doctor for further treatment advice.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, and then continue rinsing.
- Call a poison control center or doctor for treatment advice.

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able toswallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- · Do not give anything by mouth to an unconscious person.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION. Causes moderate eye irritation. Avoid contact with skin, eyes and clothing. Harmful if inhaled or absorbed through the skin. Avoid breathing vapors or spray mist. Wear protective eyewear and protective clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using the toilet. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

Commercial and Industrial uses: This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

Residential use: This pesticide is toxic to fish. Do not contaminate water by cleaning of equipment or disposal of pesticide. Do not apply directly to water.

De-activation required during clean up if a spill occurs. De-activation of [EnviroSystems® BioShield® 75] [this product] can be achieved by the addition of anionic surfactant (such as sorp, sulfonates, sulfates) in quantity equivalent to that of [EnviroSystems® BioShield® 75] [this product].

Notes:

[Bracketed Text] is optional text.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

Pesticide Storage: Store in original, tightly closed containers below 30°C (86°F) and above 0°C (32°F) in a secure area inaccessible to children and away from food or feed.

Pesticide Disposal:

{Residential use} Wastes resulting from the use of this product may be disposed on site. {Commercial/industrial use} Wastes resulting from the use of this product may be disposed on site or at an approved waste disposal facility.

Container Handling:

(Residential use) Securely wrap original container in several layers of newspaper and discard in trash.

(Commercial/industrial use) Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying.

{Insert applicable triple rinse instructions for container size below}

(5 gal or less)

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

{More than 5 gal}

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

Then offer for recycling if available, or puncture and dispose in a sanitary landfill, or by other procedures approved by state and local authorities.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Wear protective eyewear (goggles or face shield), gloves, and protective clothing when using this product. Dry treated areas and articles such as clothing before use. Remove children and pets from treated area until completely dry. Clean surfaces prior to application.

Notes:

[Bracketed Text] is optional text.

Commercial and Industrial Applications

The active ingredient in EnviroSystems® BioShield® 75 is effective against odor causing bacteria and fungi (mold and mildew), bacteria and fungi (mold and mildew) which cause staining and discoloration, and algae as a static agent. EnviroSystems® BioShield® 75 can be used as a final bacteriostatic finish on the following items to impart bacteriostatic/fungistatic (mold and mildew) and algaestatic activity.

- Air filters for furnaces, air-conditioners, air purification devices, automobiles, recirculating air handling systems
- Air filters/materials
- Aguarium filter material
- Bed sheets, blankets, and bedspreads
- Buffer pads (abrasive and polishing)
- Carpets and draperies
- Concrete additive for sewer pipes, manholes and concrete sewer structures; not to be used in treatment of storm drains
- Concrete additive for repair and renewal of sewer pipes and manholes and concrete sewer structures (Not to be used in treatment of storm drains)
- Fiberfill for upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, polyester, rayon, or wool
- Fiberglass ductboard
- Fire hose fabric
- Humidifier belts
- · Mattress pads and ticking
- Men's underwear and outerwear
- Non-woven disposable diapers
- Non-woven polyester
- Outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos)
- Polyurethane and cellulose foam for household, industrial, and institutional mops
- Polyurethane and polyethylene foam, when covered
- Polyurethane foam for packaging and cushioning in non-food contact applications
- Polyurethane foam used as a growth medium for non-food crops and plants
- Pre-moistened non-food contact towelettes and tissue wipes (these do not impart pesticidal properties)
- Roofing materials defined as shingles, roofing granules, wood shakes, felt, stone and synthetic overcoats
- Sand bags, tents, tarpaulins, sails and ropes
- Athletic and casual shoes
- Shoe insoles
- Shower curtains
- Socks comprised of nylon, nylon/orlon, cotton/nylon, linen/Lycra, acrylic/polypropylene/nylon/Lycra, wool/silk/nylon/Lycra and wool/acrylic/nylon/Lycra
- Throw rugs

Toweling (non-food contact) made of 100 percent cotton, 100 percent polyester, and blends of the two fibers

- Toilet tank and seat covers
- Umbrellas

Notes:

[Bracketed Text] is optional text.

- Upholstery made of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyelefins, polypropylene, rayon, spandex, vinyl, and wool
- Vacuum cleaner bags and filters
- Vinyl paper-wallpaper for non-food contact surfaces
- Disposable wiping cloths that can be used for multiple purposes such as dusting or washing furniture, cars, walls, windows, floors, exterior surfaces of appliances, non-food contact counter tops; the wiping cloths do not impartpesticide properties
- Women's hosiery
- Women's intimate apparel

[EnviroSystems® BioShield® 75] [This product] can be applied to organic or inorganic substrates by brushing, dipping, padding, soaking, spraying or by using foam finishing techniques.

The substrate can be dried at temperatures from ambient to a maximum of 160°C (320°F) to effect complete condensation of silanol groups and to remove water, solvents and/or traces of methanol from hydrolysis. Optimum application and drying conditions, such as time and temperature, should be determined for each application before use. If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.

EnviroSystems® BioShield® 75 when used as a concrete additive is added directly during concrete preparation. Use 40 fluid ounces per cubic feet of concrete. Addition of EnviroSystems® BioShield® 75 reduces deterioration of sewer pipes and manholes by inhibiting microbiologically induced corrosion.

Commercial applications in offices, automobiles and the following institutions: schools, hospitals, daycare centers, churches, correctional facilities

The active ingredient in EnviroSystems® BioShield® 75 is effective against odor causing bacteria and fungi (mold and mildew), bacteria and fungi (mold and mildew) which cause staining and discoloration, and algae as a static agent. EnviroSystems® BioShield® 75 can be used as a final bacteriostatic finish on the following items to impart bacteriostatic/fungistatic (mold and mildew) and algaestatic activity.

- Air filters for furnaces, air-conditioners, air purification devices, automobiles, recirculating air handling systems
- Air filters/materials
- Aguarium filter material
- Bed sheets, blankets, and bedspreads
- Buffer pads (abrasive and polishing)
- Carpets and draperies
- Fiberfill for upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, polyester, rayon, or wool
- Fiberglass ductboard
- Fire hose fabric
- Humidifier belts
- Mattress pads and ticking.
- · Men's underwear and outerwear
- Non-woven polyester

Notes:

[Bracketed Text] is optional text.

- Outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos)
- Polyurethane and cellulose foam for household, industrial, and institutional mops.
- · Polyurethane and polyethylene foam, when covered
- Polyurethane foam for packaging and cushioning in non-food contact applications
- · Polyurethane foam used as a growth medium for non-food crops and plants
- Roofing materials defined as shingles, roofing granules, wood shakes, felt, stone and synthetic overcoats
- · Sand bags, tents, tarpaulins, sails and ropes
- Athletic and casual shoes
- Shoe insoles
- Shower curtains
- Socks comprised of nylon, nylon/orlon, cotton/nylon, linen/Lycra, acrylic/polypropylene/nylon/Lycra, wool/silk/nylon/Lycra and wool/acrylic/nylon/Lycra
- Throw rugs

Toweling (non-food contact) made of 100 percent cotton, 100 percent polyester, and blends of the two fibers

- Toilet tank and seat covers
- Umbrellas
- Upholstery made of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, and wool
- · Vacuum cleaner bags and filters
- Vinyl paper-wallpaper for non-food contact surfaces
- Disposable wiping cloths that can be used for multiple purposes such as dusting or washing furniture, cars, walls, windows, floors, exterior surfaces of appliances, non-food contact counter tops; the wiping cloths do not impart pesticide properties
- Women's hosiery
- · Women's intimate apparel

For Pump Spray Application: Using pump sprayer, spray entire area 4" – 6" from the surface making sure the surface is completely covered. Apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test for staining and color-fastness of fabrics and carpets by treating and drying a small, concealed area prior to application. One gallon of EnviroSystems® BioShield® 75 treats approximately 200 square feet. When treating coarser substrates, more EnviroSystems® BioShield® 75 may be required due to absorption. A fan may be used to assist in drying carpeting.

For Commercial Spray Application: For commercial application equipment (i.e. carpet/upholstery steamers, rotary jet extraction cleaners, pressure sprayers) apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test for staining and color-fastness of fabrics and carpets by treating and drying a small, concealed area prior to application. One gallon of EnviroSystems® BioShield® 75 treats approximately 200 square feet. When treating coarser substrates, more EnviroSystems® BioShield® 75 may be required due to absorption. Dry carpet areas and surfaces before re-entry and dry articles before use. A fan may be used to assist in drying carpeting.

For Dipping/Soaking Application: Use appropriate sized wash basin or tub for dipping/soaking the item you are treating. Use enough EnviroSystems® BioShield® 75 to completely submerge item. Completely submerge item in solution for 3 minutes. Remove item and dry. Test for Notes:

[Bracketed Text] is optional text.

staining and color-fastness of fabrics by treating and drying a small, concealed area prior to application. Do not reuse solution after dipping/soaking.

The substrate can be dried at room temperatures or at temperatures to a maximum of 160°C (320°F), for example in a clothes dryer. Remove excess liquid before attempting to dry in a clothes dryer. If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.

**FOR USE AS AN ANTIMICROBIAL TO PRESERVE FINISHED FOOD CONTACT ARTICLES SUBJECT TO FDA REGULATIONS.

Incorporate BioShield® 75 Microbiostatic Agent as an antimicrobial additive to coat the polymeric manufactured products listed below that are used for manufacturing, processing, packing, packaging, transporting, handling and/or holding food or water if such use is not intended to have any effect in the food or water itself. Do not incorporate BioShield® 75 Microbiostatic into any food or water contact application listed on this label unless the substance is approved, with associated use conditions, for food or water contact in 21 CFR 174-186 (inclusive) as amended or in the US FDA's Food Contact Substance Notification System, as amended.

 This Food Contact Substance (FCS) can be used as an additive without food or beverage type or temperature limitation, in food or beverage preparation and processing surfaces (where FCS is applied to the surface as a coating).

Use: Food contact coatings, films and laminates.

Products:

Appliances, equipment and utensils, (used in preparing and processing of food products for human and animal consumption)

Barrier fabrics

Building materials and components, (used in food preparation and processing areas)

Collection and storage equipment (such as conveyor systems, piping systems, silos, tanks, and process vessels made from any material)

Cookware made from any material

Countertops and cutting boards made from composite materials, stainless steel, laminates

Food wrap (including coated deli paper, coated food interleavers, plastic wrap, polystyrene and plastic trays, aluminum foil)

General purpose containers of any material for short and long term storage

Glazing for cement tiles

Glazing for vitreous china used in plumbing fixtures such as countertops, sinks and other vessels

Industrial equipment and machinery for the preparation, processing or transportation of food and beverage products

Natural and synthetic fibers and fabrics in any combination of compositions

Packaging (made from paper, plastics or metals)

Paper products (such as wipes, tissues, wall coverings, towels)

Plastic film (of any weight and composition)

Sinks and other vessels used for cleaning or transporting food and beverage products

Maximum Concentration: 1% active weight percent of product to be coated.

 Polymeric tubing for transfer of beverages and drinking water. This FCS may be used at a maximum use level of 1% active weight of the finished tubing.

Use: Food contact molded plastic and metal parts

Products: Beverage dispensing equipment tubing, beverage processing equipment tubing, holding tanks, pumps

Maximum Concentration: 1% active weight percent of finished tubing, tank or pump

Repeat use activated carbon water filters and other water filter media. This FCS may be
used at a maximum use level of 0.25% active weight percent of the carbon block or filter
media.

Use: Process and drinking water filter

Products: Activated carbon water filters (and synthetic woven or non-woven media, zeolite and other natural media)

Maximum Concentration: 0.25% active weight percent of the carbon block or other media

Residential Applications

The active ingredient in EnviroSystems® BioShield® 75 is effective against odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae as a static agent.

	Pest controlled	Method of Application
Dedspreads, curtains, bacteria, bacteria, bacteria, bacteria, bacteria, bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew) bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew) bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew) bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew) bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew) bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew) bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew) bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew) bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew) bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew) bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew) bacteria, bacteri	DIP/SOAK: Use appropriate sized wash basin or tub for dipping/soaking the item you are treating. Use enough EnviroSystems® BioShield® 75 to completely submerge item. Keep item in solution for 3 minutes. Remove item and wring excess liquid. Drying may be attained by dripping dry or wringing excess liquid from treated item. For larger items (e.g., bedspreads, curtains, draperies), place in washing machine on spin cycle to aid in the removal of excess liquid. Test staining and color-fastness of fabric and carpets by treating and drying a small concealed area prior to application. Do not reuse solution after dipping/soaking. Dry treated articles before use. Substrates can be hang-dried at room temperature or at temperatures to a maximum of 160°C (320°F), (for example in a clothes dryer). Remove excess liquid before attempting to dry in a clothes dryer. If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.	
		SPRAY: Clean surface prior to application. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4" – 6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test staining and color-fastness of fabric by treating and drying a small, concealed area prior to application. If

Notes:

[Bracketed Text] is optional text.

		necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains and mildew stains refurn.
	Pest controlled	Method of Application
Air filters and air filter material for Furnaces, air conditioners Air purification systems Automobiles Recirculating air handling systems Vacuum cleaner filters Aquariums	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew), and algae.	SPRAY: When treating filters, remove filter from the unit. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4" – 6" from the surface making sure the surface is completely covered. Apply and then let stand until dry. If necessary, reapply Enviro Systems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains and algae stains return.
	Pest controlled	Method of Application
Carpeting	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	SPRAY: Apply to clean carpet surface. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4" – 6" from the surface making sure the surface is completely covered. For rotary jet extraction cleaners and carpet steamers, add EnviroSystems® BioShield® 75 directly to the cleaning tank, then operate the equipment in accordance with manufacturer's instructions. Apply and then let stand until dry. Test staining and color-fastness of carpets by treating and drying a small, concealed area prior to application. EnviroSystems® BioShield® 75 treats approximately 200 square feet per gallon (50 square feet per quart). When treating coarser substrates (e.g. wool carpeting), more EnviroSystems® BioShield® 75 may be required due to absorption. Dry carpet areas and surfaces before re-entry. A fan may be used to assist in drying carpeting. Remove children and pets from treated areas until completely dried. If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains and mildew stains return.

Notes:

[Bracketed Text] is optional text. {Bracketed Text} is for administrative purposes only and will not appear on the marketplace label.

	Pest controlled	Method of Application		
Mattress pad and mattress ticking and upholstery composed of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, wool; fiberfill to be used in upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, rayon or wool.	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	SPRAY: Clean surfaces prior to application Using a trigger pump sprayer, spray the entire surface area 4" – 6" from the surface making sure the surface is completely covered. Apply and then let stand until dry let stand 3 minutes and wipe dry with cloth of sponge. If spotting occurs, wipe with moist cloth or sponge. Test staining and color-fastness of fabric by treating and drying a small, concealed area prior to application. When applying to mattress pads and ticking do not soak. Remove children and pets from treated area until completely dried. If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains and mildew stains return.		
	Pest controlled	Method of Application		
Tents, tarpaulins, sails, ropes	Odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae.	SPRAY: Clean surface prior to application. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4" – 6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test staining and color-fastness of fabric by treating and drying a small, concealed area prior to application. If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains and algae stains return. DIP/SOAK: Use appropriate sized wash basin or tub for dipping/soaking the item you are treating. Use enough EnviroSystems® BioShield® 75 to completely submerge item. Keep item in solution for three minutes. Remove item and wring excess liquid. Do not reuse solution after dipping/soaking. Dry treated articles before use. Substrates can be hang-dried at room temperature or at temperatures to a maximum of 160°C (320°F); (for example in a clothes dryer). Remove excess liquid before attempting to dry in a clothes dryer. If necessary, reapply		

Notes:

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		•	EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.
	Pest controlled	•	Method of Application
Roofing materials (such as shingles, roofing granules, wood shakes, felt, stone, synthetic overcoats)	Odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae.	•	SPRAY: Make sure the roof is clean prior to application. Using a pressure sprayer, spray the entire surface area 6"-12" from the surface making sure the surface is completely covered. After applying EnviroSystems® BioShield® 75 let stand until dry. EnviroSystems® BioShield® 75 treats approximately 200 square feet of roofing per gallon (50 square feet per quart). If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.
	Pest controlled	•	Method of Application
Buffer pads (polishing and abrasive), Polyurethane and cellulose foam for household mops, vacuum cleaner bags, umbrellas, casual shoes, athletic shoes	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)		SPRAY: Clean surface prior to application. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4" – 6" from the surface making sure the surface is completely covered. Let stand unt dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains and mildew stains return.
	Pest controlled	•	Method of Application
Tubs, glazed tiles, vanity tops, shower curtains, shower stalls (areas), sinks, washable walls, wall paper, floors, window sills, cabinets, garbage cans, appliances, refrigerators (exterior), fiberglass, formica, glazed tiles, glazed porcelain, synthetic marble, plastic, vinyl.	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)		sprayer, spray the entire surface area 4" – 6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and

 discoloration due to bacteria, mold stains, and mildew stains return.

Imparts microbiostatic properties.

Use on carpet and upholstery to inhibit odor causing bacteria and fungi (mold and mildew), bacteria and fungi (mold and mildew) which cause staining and discoloration.

Notes:

[Bracketed Text] is optional text.

Unscented.

Use on carpet and upholstery to inhibit the growth of odor causing bacteria.

Use on carpet and upholstery to inhibit the growth of bacteria which cause staining and discoloration.

Use on carpet and upholstery to inhibit the growth of fungi (mold and mildew) which cause staining and discoloration.

Use on carpet and upholstery to inhibit the growth of odor causing bacteria and fungi (mold and mildew), bacteria and fungi (mold and mildew) which cause staining and discoloration.

Provides an invisible microbiostatic coating to inhibit the growth of odor causing bacteria.

Provides an invisible microbiostatic coating to inhibit the growth of bacteria which cause staining and discoloration.

Provides an invisible microbiostatic coating to inhibit the growth of fungi (mold and mildew) which cause staining and discoloration.

Provides an invisible microbiostatic coating to inhibit the growth of algae.

Provides an invisible microbiostatic coating to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae.

Prevents deterioration caused by bacteria and fungi (mold and mildew) which cause staining and discoloration.

Inhibits deterioration caused by bacteria.

Resists development of microbial odors.

Resists development of stains and discoloration due to bacteria.

Resists development of stains due to fungi (mold and mildew) which cause staining and discoloration.

Resists stains due to algae.

Resists development of microbial odors, stains and discoloration due to bacteria and fungi (mold and mildew), bacteria and fungi (mold and mildew) which cause staining and discoloration and algae.

Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria.

Provides/creates an invisible barrier to inhibit the growth of bacteria which cause staining and discoloration.

Provides/creates an invisible barrier to inhibit the growth of fungi (mold and mildew) which cause staining and discoloration.

Provides/creates an invisible barrier to inhibit the growth of algae.

Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria and fungi (mold and mildew), bacteria and fungi (mold and mildew) which cause staining and discoloration and algae.

Inhibits the growth of odor causing bacteria between cleanings.

Inhibits the growth of bacteria which cause staining and discoloration between cleanings.

Inhibits the growth of fungi (mold and mildew) which cause staining and discoloration between cleanings.

Inhibits the growth of algae between cleanings.

Inhibits the growth of odor causing bacteria and fungi (mold and mildew), bacteria and fungi (mold and mildew) which cause staining and discoloration and algae between cleanings.

Mold, mildew, odor protector and inhibitor.

EnviroSystems® BioShield® 75 is an antimicrobial agent effective against odor causing bacteria. EnviroSystems® BioShield® 75 is an antimicrobial agent effective against bacteria which cause staining and discoloration.

EnviroSystems® BioShield® 75 is an antimicrobial agent effective against fungi (mold and mildew) which cause staining and discoloration.

EnviroSystems® BioShield® 75 is an antimicrobial agent that inhibits mildew.

EnviroSystems® BioShield® 75, an antimicrobial agent, controls the source of odors on surfaces in the home, in the bathroom, in the kitchen.

Notes:

[Bracketed Text] is optional text.

Bacteriostatic, fungistatic (mold and mildew), algaestatic.

EnviroSystems® BioShield® 75, an antimicrobial agent, inhibits smelly odors caused by mold and mildew that can grow even in the cleanest of homes.

EnviroSystems® BioShield® 75, an antimicrobial agent, inhibits the growth of odor causing bacteria.

Effective on hard non-porous washable bathroom and kitchen surfaces and fixtures around the home.

Effective on modern hard non-porous washable surfaces made of fiberglass, glazed porcelain, Formica®, stainless steel, synthetic marble.

FOR MORE INFORMATION CONCERNING THIS PRODUCT, PLEASE CONSULT THE SAFETY DATA SHEET (SDS). THE SDS CAN BE OBTAINED BY CONTACTING:

IndusCo, Ltd. 2319 Joe Brown Drive Greensboro, NC 27405 (336) 375-7555 www.induscoltd.com

IMPORTANT: WARRANTY AND DISCLAIMER INFORMATION

IndusCo. Ltd warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated in this bulletin when used in accordance with directions under normal conditions of use; but this warranty of fitness for a particular purpose does not extend to the use of this product contrary to bulletin instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to the seller, and buyer assumes the risk of any such use.

INDUSCO, LTD SPECIFICALLY DISCLAIMS ANY OTHER EXPRESS OR IMPLIED WARRANTY, INCLUDING THE WARRANTY OF MERCHANTABILITY.

Notes:

[Bracketed Text] is optional text.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 1200 Pennsylvania Avenue, N.W. WASHINGTON, D.C. 20460

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Certification with Respect to Citation of Data							
Applicant's/Registrant's Name, Address, and Telephone Number IndusCo, Ltd., 2319 Joe Brown Drive, Greensboro, NC 27405 336-375-7555	EPA Registration Number/File Symbol 53053-24						
Active ingredient(s) and/or representative test compound(s) 3-(trihydoxysäyl) propyldimethyl octadecyl ammonium chloride	Date 9-28-17						
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 15 Food Surface Contact	Product Name BloShield 75						
NOTE: If your product is a 100% repackaging of another purchased EPA-register submit this form. You must submit the Formulator's Exemption Statement (EPA For	ed product labeled for all the same uses on your label, you do not n 8570-27).	need to					
I am responding to a Data-Call-in Notice, and have included with this form a be used for this purpose).	list of companies sent offers of compensation (the Deta Matrix for	m should					
SECTION I: METHOD OF DATA SUP	PORT (Check one method only)						
i am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	I am using the selective mathod of support (or otherall or under the selective mathod), and have included with this completed list of data requirements (the Data Matrix for used).	s form a					
SECTION II: GENERAL	OFFER TO PAY						
[Required if using the cite-all method or when using the cite-all option under the selection.] I hereby offer and agree to pay compensation, to other persons, with regard to							
SECTION III: CERT	FICATION						
I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or dise-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product, and (2) is a type of data that would be required to be submitted under the data requirements in effect on the data of approval of this application if the application sought the Initial registration of a product of identical or similar composition and uses.							
i certify that for each exclusive use study cited in support of this registration the written permission of the original data submitter to cite that study.	or reregistration, that I am the original data submitter or that I have	benkstdo e					
I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either; (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (I) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.							
I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are evaluable and will be submitted to the Agency upon request. Should I fell to produce such evidence to the Agency upon request, i understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.							
I certify that the statements t have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.							
Agnature Derte 1 Typed or Printed Name and Title 1 Typed or Printed Name and Title 1 Technology 1 Technology							

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	DAT	TA MATRIX			
Date April 14, 2016			EPA Reg No./File Symbol 53053-24		Page 1 of 4
Applicant's/Registrant's Name & Address			Product		
IndusCo, Ltd. 2319 Joe Brown Drive Greensboro, NC 27405			BST Protectant RTU 75	8)	
ngredient					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
EP Data					
830.1550	Product identity and composition	44379401	Inhold, LLC	OWN	
830.1600	Description of materials used to produce the product	44379401	Inhold, LLC	OWN	
830.1620	Description of production process	44379401	Inhold, LLC	OWN	
830,1670	Discussion of formation of impurities	44379401	Inhold, LLC	OWN	
830.1750	Certified limits	44379402	Inhold, LLC	OWN	
830.1800	Enforcement analytical method	44379402	Inhold, LLC	OWN	
830.6302	Color	44379403	Inhold, LLC	OWN	
830.6303	Physical state	44379403	Inhold, LLC	OWN	
830.6304	Odor	44379403	Inhold, LLC	OWN	
830.6317	Storage stability		IndusCo, Ltd.	Ongoing	
830.6320	Corrosion characteristics		IndusCo, Ltd.	Ongoing	
830.7000	pH	44379403	Inhold, ULC	OWN	
830,7100	Viscosity	44379403	Inhold, LLC	OWN	
830.7300	Density/relative density	44379403	Inhold, LLC	OWN	
870.1100	Acute oral toxicity	42456511	Dow Coming Corporation	OLD	
870.1200	Acute dermal toxicity	40385201	Dow Coming Corporation	OLD	
87O.1300	Acute inhalation toxicity	41157803	Dow Coming Corporation	OLD	
870.2400	Primary eye irritation	44789801 44789901	Inhold, LLC Inhold, LLC	OWN	
870.2500	Primary dermal irritation	40385201	Dow Coming Corporation	OLD	
870.2600	Dermal sensitization	42197401	Dow Coming Corporation	OLD	
Signature Cuida S	Bell		Name and Title Cinda L. Bell, Agent for IndusCo, Ltd.	J.	Date 4/14

Form Approved QMB No. 2070-0060

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			DATA MATRIX		
Date April 14, 2016			EPA Reg No./File Symbol 53053-24		Page 2 of 4
Applicant's/Registrant's Name & Address IndusCo, Ltd. 2319 Joe Brown Drive Greensboro, NC 27405		Product BST Protectant RTU 75			
ngredieni 1-Octadecana	minium, N.N-dimethyl-N-(3-(trimethoxysifyl)propyl)-,	chloride (PC C	Code 107401)		
Guldeline Reference Number	Guldeline Study Name	MRIO Number	Submitter	Status	Note
TGAI Data					
830,1550	Product identity and composition	44885901 44972401 49815901	Inhold, LLC Inhold, LLC IndusCo, Ltd.	OWN OWN	
830.1600	Description of materials used to produce the product	44885901 44972401 49815901 49817901	Inhold, LLC Inhold, LLC IndusCo, Ltd. Innovative Chemical Technologies	OWN OWN OWN PER	
830,1620	Description of production process	44885901 44972401 49817901	Inhold, LLC Inhold, LLC Innovative Chemical Technologies	OWN OWN PER	
830.1650	Description of formulation process	44885901 44972401 49815901	Inhold, LLC Inhold, LLC IndusCo, Ltd.	OWN OWN	
830.1670	Discussion of formation of impurities	44885901 44972401 49815901	Inhold, LLC Inhold, LLC IndusCo, Ltd.	OWN OWN	
830.1700	Preliminary analysis	44876601 49815901	Inhold, LLC IndusCo, Ltd.	OWN	
830,1750	Certified limits	44876602 49815901	inhold, LLC IndusCo, Ltd.	OWN	
830.1800	Enforcement analytical method	49815901	IndusCo, Ltd.	OWN	
830.6302	Color	44876603	Inhold, LLC	OWN	
830.6303	Physical state	44876603	Inhold, LLC	OWN	
830.6304	Odor	44876603	Inhold, LLC	OWN	
830.6313	Stability to normal and elevated temps., metals, and metal ions	44929101	inhold, LLC	OWN	
830.6315	Flammability	44876603	Inhold, LLC	OWN	
630.6317	Storage stability		IndusCo, Ltd.	Ongoing	
830.6320	Corrosion characteristics		IndusCo, Ltd.	Ongoing	Die
Signature (N) do	i G. Bell		Name and Title Cinda L. Bell, Agent for IndusCo, Ltd.		Date 4/14/110

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			DATA MATRIX		
Date April 14, 2016			EPA Reg No /File Symbol 53053-24		Page 3 of 4
Applicant's/Registrant's Name & Address		Product			
IndusCo, Ltd. 2319 Joe Brown Drive Greensboro, NC 27405			BST Protectant RTU 75		
ngredent 1-Octadecanar	ninium, N,N-dimethyl-N-(3-(trimethoxy	silyl)propyl)-, chloride (PC C	ode 107401)		
Guideline Reference Number		· MRID Number	Submitter	Status	Note
FGAI Data Continued					
830.7000	рН	44876603	Inhold, LLC	OWN	
830.7100	Viscosity	44876603	Inhold, LLC	OWN	
830.7220	Boiling point	44885902	Inhold, LLC	OWN	
830.7300	Density	44876603	Inhold, LLC	OWN	
870.1100	Acute oral toxicity		IndusCo, Ltd.	OWN	
370.1200	Acute dermal toxicity		IndusCo, Ltd.	OWN	
370,1300	Acute inhalation toxicity		IndusCo, Ltd.	OWN	Submitted concurrently with 8-month response
370.2400	Primary eye irritation		IndusCo, Ltd.	OWN	to DCI ID #PDCI-107401-30520 for EPA Reg.
370.2500	Primary dermal irritation		IndusCo, Ltd.	OWN	No. 53053-25
870.2600	Dermal sensitization		IndusCo, Ltd.	OWN	
Signature /	10 12000		Name and Title		Date //
Cirda	S. Bell		Cinda L. Bell, Agent for IndusCo	, Ltd.	4/14/16

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			DATA MATRIX			
Date April 14, 2016		EPA Reg No./File Symbol 53053-24		Page 4 Of 4		
Applicant's/Registrant's Name	8 Address		Product			
IndusCo, Ltd. 2319 Joe Brown Drive Greensboro, NC 27405			BST ProtectantRTU 75			
Ingredient 1-Octadecanar	minium, N,N-dimethyl-N-(3-(trimetho	xysilyl)propyl)-, chloride (PC C	ode 107401)	/c		
Buideline Reference Number	Guideline Study Name	MRIO Number	Submiller	Status	Note	
TGAI Data Continued						
	2		W.M. Barr & Company, Inc.			
			Natco Diversified Technologies, Inc.			
			Mason Chemical Company			
			Goulston Technologies, Inc.			
			Piedmont Chemical Industries, LLC			
			American Chemistry Council	1		
			Aegis Environments	1		
			Spray Drift Task Force			
			Coating Systems Laboratories, Inc.			
		Unelko Corporation				
			Sishleid Technologies, Inc.			
Cito all for all alberton	naining data requirements		Marinize Products, Inc.	PAY	Offer-to-pay letters sent in response to DCI ID	
cite-allito) all other ren	iaming data requirements		Jennico2 Inc.		#PDCI-069105-30933	
			Duraban International Inc.			
			American Mouldguard, Inc.		7 2 2	
			BioSafe, Inc.	-		
= = = =			NBS Technology, LLC			
			Coating Specialists, LLC			
			Vitec Global Limited			
			Tile Media Properties, Inc.			
		Abtech Industries, Inc.				
			Coeus Technology, Inc.			
			PureShield, Inc.	7		
			As Filtration, LLC			
Signature Cuil d'a	v St. Bell		Name and Title Cinda L. Bell, Agent for IndusCo, Ltd.	1	Date 4/14/10	

Laird's Regulatory Consultants, Inc.

Over 32 years of EPA, FDA, & State Pesticide Product Regulation& Consultation

August 7, 2017

Eric Miederhoff, PM 31 Environmental Protection Ageny Regulatory Management Branch (Antimicrobial Division (7510P) Office Of Pesticides Programs

Dear Eric:

In response to your request please find attached the following documents for a non-PRIA review. Addressing the questions you had as well.

- 1. EPA Label Amendment further amended as high-lighted in green. The Black print is what has already been approved for IndusCo
 - i. front page, active ingredient nomenclature clearly defined
- ii. last page added two claims 'Durable Antimicrobial' and 'Approved for use on food contact surfaces as on the Gelest label
- 2. Our response to the questions from you Eric Miederhoff
- 3. Copy of the OTP letter that was sent to Gelest
- 4. Letter addressed to me from the company
- 5. A copy of the label that has been approved for Gelest's 4100, highlighted claims on our copy showing that the claims are identical to that of 4100

Thank you in advance for your assistance during this process

Sincerely.

Olivia D. Laird, President/Owner Laird's Regulatory Consultants, Inc.

Please read Instructions or	reverse before completing	form.	Form A	pproved	. OMB No.	2070-00	60. Approval expires 2-28	
Environmental Protes Weshington, Di		rotection Agen	ection Agency		Registrat ✓ Amendm Other		OPP Identifier Number	
	A	plication for P	esticide - Se	ction				
1. Company/Product Numb 53053-24		2. EPA Product Manager PM 31			3. Proposed Classification			
4. Company/Product (Name BioShield 75		PM# Eric Miederhoff],,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		
5. Name and Address of A IndusCo, Ltd. 2319 Joe Brown Driv Greensboro, NC 27		6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3 (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. HM 4100 Antimicrobial						
			on - II					
Resubmission in res Notification - Explain Explanation: Use addition This is a Non-PRIA Submission approved on the referenced	nal page(s) if necessary. (For section (and Secti		Applica	tion,	company's	product to add claims	
		Section	n - III					
1. Material This Product Wi	Be Packaged In:							
Child-Resistant Packaging Yes Vo	Yes Yes		Water Soluble Packaging Yes ✓ No		2. Type of	Container Metal Plastic Glass		
* Certification must be submitted		o. per If "Yes" Package	No. per contain			Paper Other (Specify)		
3. Location of Net Contents Information 4. Size(s)		Size(s) Retail Container						
3. Manner in Which Label (s	Affixed to Product	Lithograph Paper glued Stenciled	Othe	er				
		Sectio	n - IV					
. Contact Point (Complete	items directly below for id	lentification of individu	al to be contacted,	, it nece.	ssery, to pr	ocess this	application.)	
leme Olivia D. Laird/Laird's Re	Title Agent/Con	Title Agent/Consultant			Telephone No. (Include Ares Code) (703) 669-0509			
I certify that the state I acknowledge that ar both under applicable	ments I have made on this by knowlingly false or mist	Certification form and all attachme adding statement may	nts thereto are tru be punishable by t	ie, accur fine or in	ate and cor nprisonmen	nplete. t or	6. Date Application Received (Starnped)	
Signature South	3. Title President/C	3. Title President/CEO						
Typed Name	5. Date	5. Date						

8-8-17

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete.

Joseph E. Mason

White - EPA File Copy (original)

Yellow - Applicant Copy



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

May 24, 2017

Cinda Bell Regulatory Specialist IndusCo, Ltd. 2319 Joe Brown Drive Greensboro, NC 27405

Subject:

CSF Notification per PRN 98-10 - New inert supplier

Product Name: EnviroSystems BioShield 75

EPA Registration Number: 53053-24 Application Date: May 1, 2017 Decision Number: 529140

Dear Ms. Bell:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10. The Antimicrobials Division (AD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The CSFs submitted with your application have been stamped "Notification" and placed in our files.

Please note that the record for this product currently contains the following CSFs:

- Basic CSF dated 5/18/2016
- Alternate CSF | dated | 12/2/2016
- Alternate CSF 2 dated 5/1/2017
- Alternate CSF 3 dated 5/1/2017

Any CSFs other than those listed above are superseded/no longer valid. If you have any questions, please contact Tara Flint via email at flint.tara@epa.gov or Eric Miederhoff at Miederhoff.eric@epa.gov.

Sincerely,

Eric Miederhoff

Product Manager 31

E. Mir bulroff

Regulatory Management Branch I Antimicrobials Division (7510P) Office of Pesticide Programs

Flint, Tara

From:

Leifer, Kerry

Sent:

Wednesday, May 17, 2017 1:46 PM

To:

Flint, Tara; Debesai, Alganesh

Subject:

RE: Inert approval

Hi Tara,

Per the compositional information provided by the manufacturer, that tradename is acceptable for use as an inert ingredient in nonfood use pesticide formulations. Alga will add the trade name into OPPIN if we haven't already done so.

Kerry

Kerry Leifer, Team Leader
Chemistry, Inerts and Toxicology Assessment Branch
Registration Division (7505P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460
tel: (703) 308-8811

tel: (703) 308-8811 fax: (703) 605-0781

e-mail: leifer.kerry@epa.gov

From: Flint, Tara

Sent: Wednesday, May 17, 2017 1:35 PM

To: Leifer, Kerry <Leifer.Kerry@epa.gov>; Debesai, Alganesh <debesai.alganesh@epa.gov>

Subject: Inert approval

Good afternoon!

I just received an inert composition letter from a registrant for approval of a new inert supplier. The inert itself I found, however I did not see the tradename for this exact company's product.

Can someone take a look at this and let me know if it passes!

Thank you

Tara Flint

Environmental Protection Specialist RMB1 | Antimicrobials Division OPP | Environmental Protection Agency (703) 34 / 0398







May 1, 2017

Mr. Eric Miederhoff
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Re:

EnviroSystems BioShield 75 (EPA Reg. No. 53053-24)

- Notification of additional inert ingredient source

Contains Confidential Business Information

Dear Mr. Miederhoff:

On behalf of IndusCo, Ltd. (EPA Co. No. 53053), SciReg, Inc. is submitting a notification to add an additional source of in the formulation for EnviroSystems BioShield 75 (EPA Reg. No. 53053-24). The SDS for the new ingredient and copies of the basic and alternate formulation CSFs are enclosed.

If you have any questions, please contact me at 703-494-6500 or cbell@SciReg.com.

Sincerely,

Cinda L. Bell, MS

Regulatory Specialist

Cineta & Bell

Enclosures

Please read instructions on	reverse before completin
€.FP∆	Environm

United States

Registration
Amendment
Other

OPP Identifier Number

₩EPA	Environmental Protection Agency Washington, DC 20460			X	Amend Other	lment		
		Applicat	ion for Pestici	de - Section	1.1			
 Company/Product Number 53053-24 	r		2. EPA F	Product Manager Miederhoff			posed Cla	
4. Company/Product (Name) EnviroSystems BioShield 75			PM# 31	PM#			None	Restricted
5. Name and Address of Applicant (Include ZIP Code)				edited Review.	In accordar	nce with FIF	RA Secti	on 3(c)(3)
IndusCo, Ltd. 2319 Joe Brown Drive Greensboro, NC 27405		4	(b)(i), m	ny product is sim				
Check if this is	a new address		Produc	ct Name				
			Section - II					
Amendment - Explain b	elow.			Final printed label Agency letter date		to		
Resubmission in respon	nse to Agency letter d	ated		'Me Too" Applicat	ion.			
X Notification - Explain be	elow.			Other - Explain be	low.			
Notification of additional solutional solutions of additional solutions and the solution is consisted and the solution of the	tent with the provision or the confidential atement to EPA. I funct may be in violated in the provision of the confidential atement to EPA. I funct may be in violated in the confidential at the confidential atem. If "Yes" Unit Packaging wgt. If "Yes" Unit Packaging wgt.	No. Per Container 4. Size(s) Ret	otice 98-10 and EPA formula of this produce and that if this notification of the subject of the	ct. I understand cation is not con to enforcement ckaging No. Per Container 5. Loca	that it is a sistent with taction and	riolation of the terms of penalties un f Container Metal Plastic Glass Paper Other (Speci	18 U.S.C. of PR Notinder sect	Sec. 1001 to ce 98-10 and
		Sten	ciled					
Contact Point (Camplete i	tame directly below to	e identification	Section - IV		to process	this application	on I	
Name	terns directly below to	- identification (Title	nucu, n necessar)				Area Cude)
			ent for IndusCo, Ltd.		Telephone No. (Include Area Cude) 703-494-6500; chall@SciReg.com			
I certify that the statements I acknowledge that any kno both under applicable law.			all attachments thereto			2000	Recei	Application ived amped)
Cinela &	Bell		Agent for IndusCo	o, Ltd.				
Typed Name Cinda L. Bell			5. Date 5/1/17	L				



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

March 16, 2017

Cinda L. Bell SciReg, Inc., agent for IndusCo, Ltd 2319 Joe Brown Drive Greensboro, NC 27405

Subject:

CSF Amendment - Addition of inert ingredient source to Alternate CSF

Product Name: EnviroSystems BioShield 75

EPA Registration Number: 53053-24 Application Date: December 07, 2016

Decision Number: 524251

Dear Ms. Bell:

The Confidential Statement of Formula (CSF) referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

Please note that the record for this product currently contains the following CSFs:

- Basic CSF dated 05/18/2016
- Alternate CSF 1 dated 12/02/2016

Any CSFs other than those listed above are superseded/no longer valid. If you have any questions, you may contact Mohammad Alavi at (703) 347-0522 or via email at Alavi.mohammad@epa.gov.

Sincerely,

Eric Miederhoff Product Manager 31

Regulatory Management Branch I Antimicrobials Division (7510P)

Office of Pesticide Programs

Mir berlings

Please read instructions on rev					oved. OMB No. 2	.070-0000.	
AFDA		United States			Registratio	on C	PP Identifier Number
\$EPA	Environmen	ntal Protecti	on Agency		Amendme		
	Washington, DC 20460			x	Other		
		Applicati	on for Pesticide	- Section	1		
1. Company/Product Number	er	, .p.p.,		duct Manager		3. Propo	sed Classification
53053-24			Eric Mied			X N	ADMIT
 Company/Product (Name EnviroSystems BioShie 	eld 75		PM# 31				ne Restricted
Name and Address of App	ulicant (Include ZIP C	ode)					Section 3(c)(3)
IndusCo, Ltd.				roduct is simi	lar or identical in	compos	ition and labeling
2319 Joe Brown Drive			to:	22			
Greensboro, NC 27405	į.		EPA Reg	. No			
Check if this is	a new address		Product N	Name			
			Section - II				
Amendment - Explain b	elow		Fina		in response to		
百				ncy letter dated			
Resubmission in respon	ise to Agency letter d	ated		Too" Application	on.		
X Notification - Explain b	elow.		Othe	er - Explain belo	ow.		
Explanation: Use addition	al page(s) if necessar	v (For section I	and Section II.)				
	pegrey.	1. 0	and double,				
Notification of additional s	ource of inert ingre	dient per PR N	otice 98-10.				
This notification is consis							
been made to the labeling	or the confidential	statement of fo	rmula of this product.	1 understand	that it is a violat	ion of 18	U.S.C. Sec. 1001 to
willfully make any false sta	atement to EPA. I fu	urther understar	nd that if this notification	on is not cons	sistent with the to	erms of P	R Notice 98-10 and
40 CFR 152.46, this produ	uct may be in violati	ion of FIFRA ar	nd I may be subject to	enforcement	action and pena	ilties und	er sections 12 and 14
of FIFRA."							
			Section - III				
. Material This Product Wil	Be Packaged In:						
Child-Resistant Packaging	Unit Packaging		Water Soluble Packag	ging	2. Type of Cont	ainer	
Yes	Yes		Yes		Meta		
100	103		1 1 1 1 1 1 1 1		Plas		
□ No	No		□ No		Glas		
* Certification must	If "Yes"	No. Per	f "Yes"	No. Per	Papi	er er (Specify)	
be submitted	Unit Packaging wgt.	Container	Package wgt	Container		, (op),	
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Label C	ontainer Affixed to Product	Lithogr Paper Stancil	glued led Section - IV	Other	On labet. On label accompai	nying prod	
Label C	ontainer Affixed to Product	Lithogr Paper Stancil	glued led Section - IV	Other	On label accompai	nying prod	
Label C 6. Manner in Which Label is a 7. Contact Point (Complete in Complete	ontainer Affixed to Product	Lithogr Paper Standl	glued led Section - IV	Other	On label accompai	oplication.)	Include Area Code)
Label C 6. Manner in Which Label is a 1. Contact Point (Complete in Name)	ontainer Affixed to Product	Lithogr Paper Stenci	glued led Section - IV individual to be contacted	Otherd, if necessary,	On label accompai	oplication.)	
Label Complete is A Contact Point (Complete in Name Cinda L. Bell	ontainer Affixed to Product items directly below fo	Lithogr Paper Stenct Stenct or identification of Certification	glued Section - IV Individual to be contacted Title Agent for IndusCo, Ltd	Other	On label accompai to process this ap Telep 703-4	oplication.)	Include Area Code) cbell@SciReg.com Date Application
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5. Date

Typed Name

Cinda L. Bell



December 7, 2016

Mr. Eric Miederhoff
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Re: EnviroSystems BioShield 75 (EPA Reg. No. 53053-24)

- Notification of additional inert ingredient source

Contains Confidential Business Information

Dear Mr. Miederhoff:

On behalf of IndusCo, Ltd. (EPA Co. No. 53053), SciReg, Inc. is submitting a notification to add an additional source of the in the formulation for EnviroSystems BioShield 75 (EPA Reg. No. 53053-24). The SDS for the new ingredient and a copy of the basic and alternate formulation CSFs are enclosed.

If you have any questions, please contact me at 703-494-6500 or chell@SciReg.com.

Sincerely,

Cinda L. Bell, MS Regulatory Specialist

Circle & Bell

Enclosures

From: To:

Cinda Bell Alavi, Mohammad Miederhoff, Eric

Cc: Subject: Date:

RE: EPA reg. nos. 53053-21 and 53053-24 Monday, March 13, 2017 9:29:44 AM

Dear Mohammad.

Please see our responses below in red text.

Kind regards, Cinda

From: Alavi, Mohammad [mailto:alavi.mohammad@epa.gov]

Sent: Thursday, March 09, 2017 10:45 AM

To: Cinda Bell Cc: Miederhoff, Eric

Subject: Re: EPA reg. nos. 53053-21 and 53053-24

Dear Ms. Bell:

I am reviewing your notifications to add an additional source of inert to the basic and alternate CSFs for EPA reg. no. 53053-21 and 53053-24. I would appreciate if you could provide clarification for the followings:

- 1. For both EPA reg. no. 53053-21 and 53053-24 the alternate CSFs depict a change of source for the inert. This is not the case for the basic CSFs. If you need to change the source of inerts in the basic CSFs as well, please provide us with a revised version of those CSFs. We do not wish to change anything with the basic CSFs.
- 2. For 53053-21 the latest EPA-approved CSFs in our database are dated May 19, 1997 alternate) and May 14, 1997 (basic). For 53053-24 the latest EPA-approved CSFs in our database are dated May 18, 2016 (basic). This sounds accurate

I was wondering if this agrees with your records. Thank you.

Sincerely,

Mohammad R. Alavi, PhD Antimicrobials Division Office of Pesticide Programs Environmental Protection Agency (703) 347-0522

PROCESSING REQUEST

Reg. #: 5305	3-24 D	ecision #:	524251
Description:		mest sout	ce
Matarial Car			
Material Ser	It (see jacket):		
X New CSF(s) I	Dated: 12/02/2	016	
Other:			
and clipped together, materials to staff in tl jacket is full or only a	nd attached materials in NOT STAPLED. Then given the Information Services (vailable as an image, please). For further information	ve the jacket wil Center (ISC) (Ro ase file materia	th the coversheet and som S-4900). If a Is in a new jacket and
Reviewer:	Mohummad	A Vavi	
Division: Antimi	crobials Division		
Phone: 703	347-0522	Date:	3113/2017



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

February 1, 2017

Cinda L. Bell Agent for IndusCo, Ltd. IndusCo, Ltd. 2319 Joe Brown Drive Greensboro, NC

Subject:

Label Amendment - Minor label changes

Product Name: EnviroSystems BioShield 75

EPA Registration Number: 53053-24 Application Date: December 1, 2016

Decision Number: 524439

Dear Ms. Bell:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your lahel, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

Page 2 of 2 EPA Reg. No. 53053-24 Decision No. 524439

with FIFRA section 6. If you have any questions, you may contact Joe Daniels at (703) 347-8669 or via email at daniels.joseph@epa.gov.

Sincerely,

E. Micheleff Eric Miederhoff

Product Manager 31

Regulatory Management Branch I Antimicrobials Division (7510P) Office of Pesticide Programs

Enclosure

ACCEPTED

02/01/2017

Under the Federal Insecticide, Fungicide and Rodenlicide Act as amended, for the pesticide registered under EPA Reg. No. 500 500 51

53053-24

ENVIROSYSTEMS® BIOSHIELD® 75 MICROBIOSTATIC AGENT*

KEEP OUT OF REACH OF CHILDREN

CAUTION

[See [side] [back] panels for additional precautionary statements]

Active Ingredient: Octadecylaminodimethyltrihydroxysilyl	propyl ammonium chloride0.75%
Other Ingredients:	
Total Ingredients:	

EPA Reg. No. 53053-24 EPA Est. No. XXXX-XX-XXX

Net Contents: 32 fluid oz., 1, 5, 30, 55, 275 gal.

Lot No .:

IndusCo, Ltd. 2319 Joe Brown Drive Greensboro, NC 27405 (336) 375-7555 www.induscoltd.com

Notes:

[Bracketed Text] is optional text.

(Bracketed Text) is for administrative purposes only and will not appear on the marketplace label.

Page 1 of 12 1/25/2017

^{*} A microbiostatic agent is an agent that inhibits the growth of odor causing bacteria and fungi (mold and mildew), bacteria and fungi (mold and mildew) which cause staining and discoloration, and algae. This product does not protect users or others against food-borne or disease causing bacteria or fungi.

FIRST AID

Have the product container or label with you when calling the poison control center or doctor, or going for treatment.

IF ON SKIN:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.
- Call a poison control center or doctor for further treatment advice.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, and then continue rinsing.
- Call a poison control center or doctor for treatment advice.

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION. Causes moderate eye irritation. Avoid contact with skin, eyes and clothing. Harmful if inhaled or absorbed through the skin. Avoid breathing vapors or spray mist. Wear protective eyewear and protective clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gurn or using the toilet. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

Commercial and Industrial uses: This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

<u>Residential use</u>: This pesticide is toxic to fish. Do not contaminate water by cleaning of equipment or disposal of pesticide. Do not apply directly to water.

De-activation required during clean up if a spill occurs. De-activation of [EnviroSystems® BioShield® 75] [this product] can be achieved by the addition of anionic surfactant (such as soap, sulfonates, sulfates) in quantity equivalent to that of [EnviroSystems® BioShield® 75] [this product].

Notes:

[Bracketed Text] is optional text.

{Bracketed Text} is for administrative purposes only and will not appear on the marketplace label.

Page 2 of 12 1/25/2017

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

Pesticide Storage: Store in original, tightly closed containers below 30°C (86°F) and above 0°C (32°F) in a secure area inaccessible to children and away from food or feed.

Pesticide Disposal:

{Residential use} Wastes resulting from the use of this product may be disposed on site. {Commercial/industrial use} Wastes resulting from the use of this product may be disposed on site or at an approved waste disposal facility.

Container Handling:

{Residential use} Securely wrap original container in several layers of newspaper and discard in trash.

{Commercial/industrial use} Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying.

{Insert applicable triple rinse instructions for container size below}

{5 gal or less}

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

{More than 5 gal}

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

Then offer for recycling if available, or puncture and dispose in a sanitary landfill, or by other procedures approved by state and local authorities.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Wear protective eyewear (goggles or face shield), gloves, and protective clothing when using this product. Dry treated areas and articles such as clothing before use. Remove children and pets from treated area until completely dry. Clean surfaces prior to application.

Notes:

[Bracketed Text] is optional text.

{Bracketed Text} is for administrative purposes only and will not appear on the marketplace label.

Page 3 of 12 1/25/2017

Commercial and Industrial Applications

The active ingredient in EnviroSystems® BioShield® 75 is effective against odor causing bacteria and fungi (mold and mildew), bacteria and fungi (mold and mildew) which cause staining and discoloration, and algae as a static agent. EnviroSystems® BioShield® 75 can be used as a final bacteriostatic finish on the following items to impart bacteriostatic/fungistatic (mold and mildew) and algaestatic activity.

- Air filters for furnaces, air-conditioners, air purification devices, automobiles, recirculating air handling systems
- Air filters/materials
- Aguarium filter material
- Bed sheets, blankets, and bedspreads
- Buffer pads (abrasive and polishing)
- Carpets and draperies
- Concrete additive for sewer pipes, manholes and concrete sewer structures; not to be used in treatment of storm drains
- Concrete additive for repair and renewal of sewer pipes and manholes and concrete sewer structures (Not to be used in treatment of storm drains)
- Fiberfill for upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, polyester, rayon, or wool
- Fiberglass ductboard
- Fire hose fabric
- Humidifier belts
- Mattress pads and ticking
- Men's underwear and outerwear
- Non-woven disposable diapers
- Non-woven polyester
- Outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos)
- Polyurethane and cellulose foam for household, industrial, and institutional mops
- · Polyurethane and polyethylene foam, when covered
- Polyurethane foam for packaging and cushioning in non-food contact applications
- · Polyurethane foam used as a growth medium for non-food crops and plants
- Pre-moistened non-food contact towelettes and tissue wipes (these do not impart pesticidal properties)
- Roofing materials defined as shingles, roofing granules, wood shakes, felt, stone and synthetic overcoats
- · Sand bags, tents, tarpaulins, sails and ropes
- · Athletic and casual shoes
- Shoe insoles
- Shower curtains
- Socks comprised of nylon, nylon/orlon, cotton/nylon, linen/Lycra, acrylic/polypropylene/nylon/Lycra, wooi/silk/nylon/Lycra and wooi/acrylic/nylon/Lycra
- Throw rugs
- Toweling (non-food contact) made of 100 percent cotton, 100 percent polyester, and blends of the two fibers
- Toilet tank and seat covers
- Umbrellas

Notes:

[Bracketed Text] is optional text.

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- Upholstery made of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, and wool
- Vacuum cleaner bags and filters
- Vinyl paper-wallpaper for non-food contact surfaces
- Disposable wiping cloths that can be used for multiple purposes such as dusting or washing furniture, cars, walls, windows, floors, exterior surfaces of appliances, non-food contact counter tops; the wiping cloths do not impart pesticide properties
- Women's hosiery
- Women's intimate appare!

[EnviroSystems® BioShield® 75] [This product] can be applied to organic or inorganic substrates by brushing, dipping, padding, soaking, spraying or by using foam finishing techniques.

The substrate can be dried at temperatures from ambient to a maximum of 160°C (320°F) to effect complete condensation of silanol groups and to remove water, solvents and/or traces of methanol from hydrolysis. Optimum application and drying conditions, such as time and temperature, should be determined for each application before use. If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.

EnviroSystems® BioShield® 75 when used as a concrete additive is added directly during concrete preparation. Use 40 fluid ounces per cubic feet of concrete. Addition of EnviroSystems® BioShield® 75 reduces deterioration of sewer pipes and manholes by inhibiting microbiologically induced corrosion.

Commercial applications in, offices, automobiles and the following institutions: schools, hospitals, daycare centers, churches, correctional facilities

The active ingredient in EnviroSystems® BioShield® 75 is effective against odor causing bacteria and fungi (mold and mildew), bacteria and fungi (mold and mildew) which cause staining and discoloration, and algae as a static agent. EnviroSystems® BioShield® 75 can be used as a final bacteriostatic finish on the following items to impart bacteriostatic/fungistatic (mold and mildew) and algaestatic activity.

- Air filters for furnaces, air-conditioners, air purification devices, automobiles, recirculating air handling systems
- Air filters/materials
- · Aquarium filter material
- · Bed sheets, blankets, and bedspreads
- Buffer pads (abrasive and polishing)
- Carpets and draperies
- Fiberfill for upholstery, sleeping bags, apparel, where the fiber is cotton, natural down.
 nylon, polyester, rayon, or wool
- Fiberglass ductboard
- Fire hose fabric
- Humidifier belts
- Mattress pads and ticking
- Men's underwear and outerwear
- Non-woven polyester

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- Outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos)
- · Polyurethane and cellulose foam for household, industrial, and institutional mops
- Polyurethane and polyethylene foam, when covered
- Polyurethane foam for packaging and cushioning in non-food contact applications
- Polyurethane foam used as a growth medium for non-food crops and plants
- Roofing materials defined as shingles, roofing granules, wood shakes, felt, stone and synthetic overcoats
- · Sand bags, tents, tarpaulins, sails and ropes
- Athletic and casual shoes
- Shoe insoles
- Shower curtains
- Socks comprised of nylon, nylon/orlon, cotton/nylon, linen/Lycra, acrylic/polypropylene/nylon/Lycra, wool/silk/nylon/Lycra and wool/acrylic/nylon/Lycra
- Throw rugs
- Toweling (non-food contact) made of 100 percent cotton, 100 percent polyester, and blends of the two fibers
- Toilet tank and seat covers
- Umbrellas
- Upholstery made of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, and wool
- Vacuum cleaner bags and filters
- Vinyl paper-wallpaper for non-food contact surfaces
- Disposable wiping cloths that can be used for multiple purposes such as dusting or washing furniture, cars, walls, windows, floors, exterior surfaces of appliances, non-food contact counter tops; the wiping cloths do not impart pesticide properties
- Women's hosiery
- Women's intimate apparel

For Pump Spray Application: Using pump sprayer, spray entire area 4" – 6" from the surface making sure the surface is completely covered. Apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test for staining and color-fastness of fabrics and carpets by treating and drying a small, concealed area prior to application. One gallon of EnviroSystems® BioShield® 75 treats approximately 200 square feet. When treating coarser substrates, more EnviroSystems® BioShield® 75 may be required due to absorption. A fan may be used to assist in drying carpeting.

For Commercial Spray Application: For commercial application equipment (i.e. carpet/upholstery steamers, rotary jet extraction cleaners, pressure sprayers) apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test for staining and color-fastness of fabrics and carpets by treating and drying a small, concealed area prior to application. One gallon of EnviroSystems® BioShield® 75 treats approximately 200 square feet. When treating coarser substrates, more EnviroSystems® BioShield® 75 may be required due to absorption. Dry carpet areas and surfaces before re-entry and dry articles before use. A fan may be used to assist in drying carpeting.

For Dipping/Soaking Application: Use appropriate sized wash basin or tub for dipping/soaking the item you are treating. Use enough EnviroSystems® BioShield® 75 to completely submerge item. Completely submerge item in solution for 3 minutes. Remove item and dry. Test for Notes:

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Page 6 of 12 1/25/2017 staining and color-fastness of fabrics by treating and drying a small, concealed area prior to application. Do not reuse solution after dipping/soaking.

The substrate can be dried at room temperatures or at temperatures to a maximum of 160°C (320°F), for example in a clothes dryer. Remove excess liquid before attempting to dry in a clothes dryer. If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.

Residential Applications

The active ingredient in EnviroSystems® BioShield® 75 is effective against odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae as a static agent.

Pest controlled	Method of Application
Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	DIP/SOAK: Use appropriate sized wash basin or tub for dipping/soaking the item you are treating. Use enough EnviroSystems® BioShield® 75 to completely submerge item. Keep item in solution for 3 minutes. Remove item and wring excess liquid. Drying may be attained by dripping dry or wringing excess liquid from treated item. For larger items (e.g., bedspreads, curtains, draperies), place in washing machine on spin cycle to aid in the removal of excess liquid. Test staining and color-fastness of fabric and carpets by treating and drying a small concealed area prior to application. Do not reuse solution after dipping/soaking. Dry treated articles before use. Substrates can be hang-dried at room temperature or at temperatures to a maximum of 160°C (320°F), (for example in a clothes dryer). Remove excess liquid before attempting to dry in a clothes dryer. If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return. SPRAY: Clean surface prior to application. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4" – 6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test staining and color-
	controlled Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold

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		necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains and mildew stains return.
	Pest controlled	Method of Application
Air filters and air filter material for Furnaces, air conditioners Air purification systems Automobiles Recirculating air handling systems Vacuum cleaner filters Aquariums	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew), and algae.	SPRAY: When treating filters, remove filter from the unit. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4" – 6" from the surface making sure the surface is completely covered. Apply and then let stand until dry. If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains and algae stains return.
	Pest controlled	Method of Application
Carpeting	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	SPRAY: Apply to clean carpet surface. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4" – 6" from the surface making sure the surface is completely covered. For rotary jet extraction cleaners and carpet steamers, add EnviroSystems® BioShield® 75 directly to the cleaning tank, then operate the equipment in accordance with manufacturer's instructions. Apply and then let stand until dry. Test staining and color-fastness of carpets by treating and drying a small, concealed area prior to application. EnviroSystems® BioShield® 75 treats approximately 200 square feet per gallon (50 square feet per quart). When treating coarser substrates (e.g. wool carpeting), more EnviroSystems® BioShield® 75 may be required due to absorption. Dry carpet areas and surfaces before re-entry. A fan may be used to assist in drying carpeting. Remove children and pets from treated areas until completely dried. If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains and mildew stains return.

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	Pest controlled	Method of Application
Mattress pad and mattress ticking and upholstery composed of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, wool; fiberfill to be used in upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, rayon or wool.	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	SPRAY: Clean surfaces prior to application. Using a trigger pump sprayer, spray the entire surface area 4" – 6" from the surface making sure the surface is completely covered. Apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test staining and color-fastness of fabric by treating and drying a small, concealed area prior to application. When applying to mattress pads and ticking do not soak. Remove children and pets from treated area until completely dried. If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains and mildew stains return.
	Pest controlled	Method of Application
Tents, tarpaulins, sails, ropes	Odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae.	SPRAY: Clean surface prior to application. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4" – 6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test staining and color-fastness of fabric by treating and drying a small, concealed area prior to application. If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains and algae stains return. DIP/SOAK: Use appropriate sized wash basin or tub for dipping/soaking the item you are treating. Use enough EnviroSystems® BioShield® 75 to completely submerge item. Keep item in solution for three minutes. Remove item and wring excess liquid. Do not reuse solution after dipping/soaking. Dry treated articles before use. Substrates can be hang-dried at room temperature or at temperatures to a maximum of 160°C (320°F); (for example in a clothes dryer). Remove excess liquid before attempting to

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		EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.
	Pest controlled	Method of Application
Roofing materials (such as shingles, roofing granules, wood shakes, felt, stone, synthetic overcoats)	Odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae.	SPRAY: Make sure the roof is clean prior to application. Using a pressure sprayer, spray the entire surface area 6"-12" from the surface making sure the surface is completely covered. After applying EnviroSystems® BioShield® 75 let stand until dry. EnviroSystems® BioShield® 75 treats approximately 200 square feet of roofing per gallon (50 square feet per quart). If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.
	Pest controlled	Method of Application
Buffer pads (polishing and abrasive), Polyurethane and cellulose foam for household mops, vacuum cleaner bags, umbrellas, casual shoes, athletic shoes	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	SPRAY: Clean surface prior to application. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4" – 6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains and mildew stains return.
	Pest controlled	Method of Application
Tubs, glazed tiles, vanity tops, shower curtains, shower stalls (areas), sinks, washable walls, wall paper for non-food contact, floors, window sills, cabinets, garbage cans, appliances, refrigerators (exterior), fiberglass, formica, glazed tiles, glazed porcelain, synthetic marble, plastic, vinyl.	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	SPRAY: Using a trigger pump sprayer, spray the entire surface area 4" – 6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. If necessary, reapply EnviroSystems® BioShield® 75 every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.

Imparts microbiostatic properties.

Use on carpet and upholstery to inhibit odor causing bacteria and fungi (mold and mildew), bacteria and fungi (mold and mildew) which cause staining and discoloration.

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Unscented.

Use on carpet and upholstery to inhibit the growth of odor causing bacteria.

Use on carpet and upholstery to inhibit the growth of bacteria which cause staining and discoloration.

Use on carpet and upholstery to inhibit the growth of fungi (mold and mildew) which cause staining and discoloration.

Use on carpet and upholstery to inhibit the growth of odor causing bacteria and fungi (mold and mildew), bacteria and fungi (mold and mildew) which cause staining and discoloration.

Provides an invisible microbiostatic coating to inhibit the growth of odor causing bacteria.

Provides an invisible microbiostatic coating to inhibit the growth of bacteria which cause staining and discoloration.

Provides an invisible microbiostatic coating to inhibit the growth of fungi (mold and mildew) which cause staining and discoloration.

Provides an invisible microbiostatic coating to inhibit the growth of algae.

Provides an invisible microbiostatic coating to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae.

Prevents deterioration caused by bacteria and fungi (mold and mildew) which cause staining and discoloration.

Inhibits deterioration caused by bacteria.

Resists development of microbial odors.

Resists development of stains and discoloration due to bacteria.

Resists development of stains due to fungi (mold and mildew) which cause staining and discoloration.

Resists stains due to algae.

Resists development of microbial odors, stains and discoloration due to bacteria and fungi (mold and mildew), bacteria and fungi (mold and mildew) which cause staining and discoloration and algae.

Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria.

Provides/creates an invisible barrier to inhibit the growth of bacteria which cause staining and discoloration.

Provides/creates an invisible barrier to inhibit the growth of fungi (mold and mildew) which cause staining and discoloration.

Provides/creates an invisible barrier to inhibit the growth of algae.

Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria and fungi (mold and mildew), bacteria and fungi (mold and mildew) which cause staining and discoloration and algae.

Inhibits the growth of odor causing bacteria between cleanings.

Inhibits the growth of bacteria which cause staining and discoloration between cleanings. Inhibits the growth of fungi (mold and mildew) which cause staining and discoloration between cleanings.

Inhibits the growth of algae between cleanings.

Inhibits the growth of odor causing bacteria and fungi (mold and mildew), bacteria and fungi (mold and mildew) which cause staining and discoloration and algae between cleanings.

Mold, mildew, odor protector and inhibitor.

EnviroSystems® BioShield® 75 is an antimicrobial agent effective against odor causing bacteria. EnviroSystems® BioShield® 75 is an antimicrobial agent effective against bacteria which cause staining and discoloration.

EnviroSystems® BioShield® 75 is an antimicrobial agent effective against fungi (mold and mildew) which cause staining and discoloration.

EnviroSystems® BioShield® 75 is an antimicrobial agent that inhibits mildew.

EnviroSystems® BioShield® 75, an antimicrobial agent, controls the source of odors on surfaces in the home, in the bathroom, in the kitchen.

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Page 11 of 12 1/25/2017 Bacteriostatic, fungistatic (mold and mildew), algaestatic.

EnviroSystems® BioShield® 75, an antimicrobial agent, inhibits smelly odors caused by mold and mildew that can grow even in the cleanest of homes.

EnviroSystems® BioShield® 75, an antimicrobial agent, inhibits the growth of odor causing bacteria.

Effective on hard non-porous washable bathroom and non-food kitchen surfaces and fixtures around the home.

Effective on modern hard non-porous non-food contact washable surfaces made of fiberglass, glazed porcelain, Formica®, stainless steel, synthetic marble.

FOR MORE INFORMATION CONCERNING THIS PRODUCT, PLEASE CONSULT THE SAFETY DATA SHEET (SDS). THE SDS CAN BE OBTAINED BY CONTACTING:

IndusCo, Ltd. 2319 Joe Brown Drive Greensboro, NC 27405 (336) 375-7555 www.induscoltd.com

IMPORTANT: WARRANTY AND DISCLAIMER INFORMATION

IndusCo, Ltd warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated in this bulletin when used in accordance with directions under normal conditions of use; but this warranty of fitness for a particular purpose does not extend to the use of this product contrary to bulletin instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to the seller, and buyer assumes the risk of any such use.

INDUSCO, LTD SPECIFICALLY DISCLAIMS ANY OTHER EXPRESS OR IMPLIED WARRANTY, INCLUDING THE WARRANTY OF MERCHANTABILITY.

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Daniels, Joseph

From:

Cinda Bell <cbell@SciReg.com>

Sent:

Tuesday, January 03, 2017 3:27 PM Alavi, Mohammad; Daniels, Joseph

To:

Miederhoff, Eric

Subject:

RE: EPA Reg. No. 53053-24, -28

Hi Mohammad.

Yes, those are the revised labels for your review.

Kind regards,

Cinda

From: Alavi, Mohammad [mailto:alavi.mohammad@epa.gov]

Sent: Tuesday, January 03, 2017 3:15 PM

To: Cinda Bell; Daniels, Joseph

Cc: Miederhoff, Eric

Subject: RE: EPA Reg. No. 53053-24, -28

Hi Cinda,

I received the copy of the email you sent to Joe. There were two labels attached to the email. Please let me know if these are the revised labels that I should review. With regards to the notifications that I am processing I prefer that you communicate with me directly and CC Joe. I will wait to hear from you regarding the revised labels. Thank you.

Mohammad

From: Cinda Bell [mailto:cbell@SciReg.com]
Sent: Tuesday, January 03, 2017 10:03 AM
To: Daniels, Joseph < Daniels. Joseph@epa.gov>

Cc: Miederhoff, Eric <Miederhoff.Eric@epa.gov>; Alavi, Mohammad <alavi.mohammad@epa.gov>

Subject: RE: EPA Reg. No. 53053-24, -28

Hi Joe,

We submitted label amendments for these two products back on August 23, 2016 to split the label into a container label and a package insert and received the attached email from Mohammad. I spoke with our client right before Christmas regarding their labeling procedure and we decided to keep all of the information on the label so there is no longer a container label and package insert; there will just be one label. Therefore, the revised labels are attached. Can you please work with Mohammad as needed?

Please let me know if you have any questions.

Kind regards,

Cinda

From: Daniels, Joseph [mailto:Daniels.Joseph@epa.gov]

Sent: Tuesday, January 03, 2017 9:30 AM

To: Cinda Bell Cc: Miederhoff, Eric

Subject: EPA Reg. No. 53053-24, -28

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Good morning, and Happy New Year! I was just looking at your label amendments, and it looks like your labels for -24 and -28 are adding a package insert that was not mentioned in the redlined version or cover letter (as compared to the previously approved labels approved on August 4, 2016). If this is correct, can you please add this change to the cover letter and send me a revised copy. Thanks!

Joe Daniels
Environmental Protection Specialist
Antimicrobials Division
Office of Pesticide Programs
Environmental Protection Agency
(703) 347-8669

